

DANA RESERVE SPECIFIC PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

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PREPARED FOR

County of San Luis Obispo
Planning and Building Department
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CHAPTER 9. RESPONSE TO COMMENTS

The Response to Comments chapter of the Environmental Impact Report (EIR) presents responses to comment letters that were received on the Draft EIR for the Dana Reserve Specific Plan, Conditional Use Permit, Vesting Tentative Tract Map, Development Agreement, and associated County-initiated General Plan amendment (project). These comment letters were received from multiple entities, including state and local agencies, non-agency organizations, and members of the public. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132(d) and 15088, this Final EIR presents the County of San Luis Obispo's (County) response to comments submitted during the Draft EIR review and consultation process.

The comment letters are in chronological order with the responses following the individual letters. Comment letters are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. A set of Master Responses has been developed to address certain topical issues raised multiple times by different commenters. These Master Responses are provided in Section 9.1 and referenced throughout the chapter.

Information received in this Response to Comments chapter clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR that would result in a new or substantially increased environmental impact as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document under State CEQA Guidelines Section 15088.5.

9.1 MASTER RESPONSES

Many comments submitted by members of the public related to substantially similar issues. The following responses are master responses intended to address all of the comments submitted in relation to these issue areas. All individual responses set out in the following sections related to comments regarding one of these issue areas are referred back to the appropriate master response to avoid unnecessary length and duplication in this document.

Table 9.1-1. Master Responses

Master Response #	Master Response
MR-1	**Groundwater Management and Impacts** The Santa Maria Groundwater Basin is fully adjudicated and its management is dictated by the courts (https://www.countyofsb.org/2535/Santa-Maria-River-Valley-Groundwater-Bas). Following ongoing litigation regarding management of the basin beginning in 1997, a final court judgment was filed in 2008, which required a minimum of 2,500 acre-feet per year (AFY) of supplemental water from the City of Santa Maria to be transmitted to the Nipomo Mesa Management Area (NMMA) by the Nipomo Community Services District (NCSD). The intent of the requirement was to bring water from outside areas within the larger Santa Maria Groundwater Basin onto the Nipomo Mesa to reduce demands on groundwater in the Nipomo Mesa subbasin. NCSD included in the initial agreement with the City of Santa Maria an additional 500 AFY to be transmitted to the Nipomo Mesa for future growth and development. Per the terms of the 2005 Stipulation and 2008 Judgment resulting from the Santa Maria Groundwater Litigation (1997), all new urban uses are required to provide a source of supplemental water to offset the water demand associated with the development. Currently, the only source of supplemental water dedicated to new urban uses is the 500 AFY allotted to the NCSD per the Nipomo Supplemental Water Project (NMMA Technical Group 2023). Since the date of the final court judgement, the NCSD has committed to holding approval to any new water connections to the already allotted 500 AFY, unless and until the NCSD defines and acquires additional sources of supplemental water. Therefore, the proposed project would not result in new groundwater pumping. In accordance with the final court judgement, the NCSD executed a Wholesale Water Supply Agreement (Wholesale Agreement) with the City of Santa Maria in 2013. Groundwater from the Nipomo Mesa subbasin was

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	the sole source of the NCSD water supply until 2015, when the NCSD began importing water from the City of Santa Maria as part of the Nipomo Supplemental Water Project per the terms of the Wholesale Agreement. The final court judgment established the Nipomo Mesa Management Area Technical Group (Technical Group), which is the court-assigned entity responsible for assessment of the groundwater within the Nipomo Mesa Management Area. The Technical Group has identified voluntary groundwater pumping reduction targets based on the level of water severity condition for the Nipomo Mesa Management Area subbasin. The Technical Group assigned a Stage IV water severity condition for the subbasin, resulting in a voluntary reduction goal of 50% below the 5-year (2009-2013) average production rate – the Technical Group's established production measurement for its Water Shortage Response Stages plan (NMMA Technical Group 2023; refer to Appendix C – Well Management Plan). This 50% reduction in average groundwater pumping rates would leave NCSD with 1,267 AFY of available groundwater supplies. The EIR analysis assumed the NCSD's groundwater supply would be limited to 1,267 AFY per the 50% reduction goal, and therefore, did not rely on any improved condition of the basin or any potential increase in groundwater availability in future years. It should be noted that the NMMA Technical Group's most recent 15th Annual Report – Calendar Year 2022 (as well as previous annual reports) identifies agricultural uses as the majority groundwater user on the Nipomo Mesa compared to urban/industrial uses, with an approximately 55% to 45% split (NMMA Technical Group 2023). As described in Section 4.19.1.1.2 of the EIR, the Nipomo Community Services District (NCSD) now relies on water from the Nipomo Supplemental Water Project (NSWP) and groundwater as its two primary water sources, with the majority of its water supply coming from the NSWP. Table 4.19-2 of the EIR depicts projected NCSD water supply sources, including the 1,267 AFY of groundwater. Per the terms of the final court judgement and Wholesale Agreement, NCSD and other water providers on the Nipomo Mesa (Golden State Water Company, Woodlands Mutual Water Company) have brought a minimum of 1,000 AFY of water onto the Nipomo Mesa through the Nipomo Supplemental Water Project every year since 2020. On July 1, 2025, the minimum amount of water required to be brought onto the Nipomo Mesa will increase to no less than 2,500 AFY. In all scenarios evaluated, including a multiple drought year scenario under a maximum anticipated infill development scenario throughout the NCSD's entire service area, the NCSD is projected to have a surplus in water supplies assuming the 50% reduction in groundwater supply compared to average groundwater production rates (limit of 1,267 AFY groundwater supply) in combination with the increased minimum delivery of water onto the Nipomo Mesa via the Nipomo Supplemental Water Project required per the terms of the final court judgment and Wholesale Agreement (2,500 AFY minimum). This surplus exists even without the additional 500 AFY supply source for new growth/development, which is another reliable supply source for the NCSD through the Nipomo Supplemental Water Project, if needed. The NCSD recently adopted its 2020 Urban Water Management Plan (UWMP), which characterizes the NCSD's existing and future water supply during normal, single-dry, and multiple-dry year conditions. As identified in Section 3.4.1 of the UWMP, Growth Scenario 1, which identifies a population of 18,398 people in the year 2045, was used to determine future water supply projections. This population projection includes the existing NCSD population, infill development within the existing service area (parcels with reserved NCSD capacity, parcels currently served by private wells, and development of vacant parcels), and future population associated with annexations under review. Annexation of the DRSP area was under review at the time of preparation of the UWMP; therefore, the project population from buildout of the DRSP is included in the population projections throughout the UWMP. The UWMP concludes that the NCSD has more than enough available water supply for the existing and future NCSD service area during normal, single-dry, and multiple-dry year conditions. As part of the California Water Code, the California Urban Water Management Planning Act (UWMP Act) requires all urban water suppliers with more than 3,000 connections or distributing more than 3,000 AFY to complete an UWMP every five years. The UWMP Act is administered by the California Department of Water Resources (DWR), who reviews the plans for completeness. Note, the DWR submitted comments on the Draft EIR for the project, though none of them questioned the water availability or sustainability for the project. As described in Section 1.2 of the UWMP, the most recent version of the NMMA Technical Groups annual report (13th Annual Report) was used in developing the UWMP. The UWMP evaluates the reliability of water supply sources, and the NCSD's 2020 UWMP determined that based on the existing infrastructure already in place and existing contractual obligations between the NCSD and City of Santa Maria, Nipomo supplemental water is considered 100% reliable and available during normal, single dry, and multiple dry years (NCSD 2020 UWMP [MKN 2021]). To identify potential water supply reliability concerns, the NCSD's UWMP included a preliminary climate change vulnerability screening analysis (including impacts from extreme heat, water quality, sea level rise, flooding, and wildfire) for its supplies. Changes to the Water Code in 2020 require new UWMPs to analyze a five-consecutive year drought, compared to 2015 UWMPs that analyzed a three-consecutive year drought. Based on the redundancy of the NCSD system, multiple well sites throughout the system, and groundwater management practices under the NMMA, the UWMP determined the NCSD's water supply sources were 100% reliable and available during normal, single dry, and multiple dry year conditions (refer to Sections 7.2 and 7.3 of the NCSD 2020 UWMP). Another component of the UWMP Act is that urban water management plans must include a water shortage contingency plan, including identifying key attributes of its water supply reliability analysis, standard ranges for

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identifying water shortage levels, locally appropriate shortage response actions for each shortage level, procedures for conducting an annual water supply and demand assessment, and a reevaluation and improvement process to assess the functionality of the water shortage contingency plan and process to make appropriate adjustments when warranted. The details of the water shortage contingency plan include both voluntary and mandatory measures, such as: water conservation education and public outreach, requirements for timely leak repair, landscape irrigation limitations, restriction on decorative water uses (such as fountains), requirements to cover swimming pools and spas, and prohibition of potable water use for construction and dust control, along with other more restrictive landscape restriction and prohibition measures.

The City of Santa Maria is likewise required to prepare an UWMP per the UWMP Act. The City's UWMP identified two sources of water supply: (1) State Water Project surface water imported from northern California through canals and pipelines, and (2) groundwater. The City's UWMP determined that the City's water supply resources are expected to provide adequate water through the year 2045. As described in the City's UWMP:

> The State of California set a goal for all cities to reduce their water use by 20% and to achieve this goal by the year 2020. To reach this goal, the City needs to limit water use to 118 gallons per day for each person. In 2020, the City met this goal with a per person use of 109 gallons per day and will continue water conservation programs to keep meeting this goal in the future.

The City's UWMP also describes the City's water conservation programs that would be implemented in the event of drought or other water supply issues, as further detailed in the City's water shortage contingency plan. The City's UWMP concludes that "the City will typically not experience water shortages unless there is a catastrophic interruption in supply" (City of Santa Maria 2020 UWMP [Provost & Pritchard 2021]). The City's UWMP includes water demands resulting from the sale of water to other water agencies, including NCSD per the terms of the final court order and Wholesale Agreement (refer to Section 4.4 of the City of Santa Maria UWMP).

Additionally, a Water Supply Analysis (WSA) per the requirements of Senate Bill (SB) 610 was prepared for the proposed project, which concluded (consistent with the 2020 UWMP) that the NCSD would have adequate available water supply to supply water for the proposed project at full-buildout during normal, single-dry, and multiple-dry year conditions.

The NMMA's 14th Annual Report – Calendar Year 2021 (submitted April 2022) reported that severe water shortage conditions continue in the Nipomo Mesa Management Area subbasin in 2021 and that only 1,064 AFY of imported water was delivered through the Nipomo Supplemental Water Project in 2021. Section 4.10.5 of the EIR has been corrected to reflect that currently a minimum of 1,000 AFY is delivered to the Nipomo Mesa via the Nipomo Supplemental Water Project and that amount will increase to a minimum of 2,500 AFY in 2025. Section 9.2 of the NMMA's 14th Annual Report provides technical recommendations for continued management of the Nipomo Mesa subbasin. The first recommendation (not organized in order of priority) is that reducing groundwater pumping is the most effective method to reduce the stress on aquifers and allow the groundwater to recover. The recommendation also suggests that the Nipomo Supplemental Water Project is another viable method to achieve these goals and should continue to be implemented consistent with the final court judgement.

The Dana Reserve project would facilitate further implementation of the Nipomo Supplemental Water Project consistent with the recommendation of the NMMA by bringing water onto the Nipomo Mesa and applying it to land uses within the mesa, a large majority of which would be recaptured through wastewater collection and treated at the NCSD's Southland wastewater treatment facility, where it can percolate back into the Nipomo Mesa subbasin.

There is evidence that some of the water from the Southland wastewater treatment facility flows east towards Nipomo Creek. Even these flows eventually percolate back into the larger Santa Maria groundwater basin. Per the NMMA's 15th Annual Report, there is a lack of detailed understanding of the flow path of rainfall, applied water, and treated wastewater to specific aquifers underling the NMMA; however, the NCSD's Southland WWTF discharges treated wastewater into infiltration basins, a portion of which percolates and returns to the groundwater system and a portion of which evaporates. The NMMA Technical Group's 15th annual report estimated percolation of approximately 475 AFY from the NCSD Southland facility. Even if some water percolates and flows to the east, toward Nipomo Creek, because the water to serve the project would come from outside of the mesa, and some portion of it would stay on the mesa and recharge the Nipomo Mesa subbasin, the project would result in a net benefit to the Nipomo Mesa subbasin, consistent with the recommendations of the NMMA.

Inevitably, there is a certain level of uncertainty regarding the availability of future water supplies, particularly given recent drought conditions, climate change, and the years-long anticipated build-out schedule of the project. Therefore, even though the analysis in the EIR consistently shows adequate water supply to serve the project, the EIR conservatively included Mitigation Measure USS/mm-3.1, which requires that prior to the issuance of development permits for any future project development phase, the project developer is required to provide proof of water supply sufficient to meet the estimated water demand for proposed development. With implementation of Mitigation Measures USS/mm-3.1 and required compliance with existing regulations, court judgements, the Wholesale Agreement, and terms of applicable urban water management plans, residual impacts related to groundwater would be less than significant.

The results of the UWMP and WSA were summarized in detail in Section 19, *Utilities and Service Systems*, of the EIR.

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MR-2	**Public Facilities Impacts** The need for another fire station and Sheriff's substation in the Nipomo area is the result of increased demand for public safety services over the last several years from all past, current, and planned future development, in addition to the Dana Reserve project. Increased demand results in longer response times. This is evidenced by the fact that the need for a new fire station was identified in the Strategic Plan for the San Luis Obispo County Fire Department, in order to keep pace with growth and meet response time goals on the west side of Highway 101. The Strategic Plan estimated the cost of a new fire station in Nipomo at $10 million; more recent calculations estimate the cost at $15 million. The location of a new Sheriff's substation in Nipomo has been identified (at the corner of Tefft and Carrillo) and the County has dedicated $1.2 million in Fiscal Year 23-24 towards the first phase of the design-build process. Build out of the Dana Reserve project will increase demand and contribute to the existing need for these public services. All development in the County is required to pay proportionate public facility fees (PFF) per a County-adopted rate schedule, which are intended to be utilized to construct and operate a variety of public facilities and services, like fire, law enforcement, libraries, parks, and general government. The County Board of Supervisors established the PFF program to ensure new development projects contribute to the cost of public facilities and services. The Dana Reserve is required to pay full PFF fees per the County's current rate schedule, consistent with all other development in Nipomo, each of which contributes to the increasing demand and need for public services, including the current need for a new fire station and Sheriffs' substation in Nipomo. PFF requirements for the Dana Reserve project are estimated to total approximately $8.5 million, including approximately $2.9 million for fire services and $1 million for Sheriff services. The remainder includes approximately $2 million for parks, $1 million for library services, and $1.5 million for general government services. The County's 5-Year Capital Improvement Plan (CIP) is a multi-year document designed to identify, prioritize, and track the progress of capital projects with estimated costs over $100,000 that relate to the maintenance, improvement, or building of infrastructure and facilities during the 5-year planning period. PFF is one type of funding source that is used to advance capital projects that are identified in the CIP. In addition to payment of PFF (consistent with all other development in the County), the EIR for the project identified mitigation requiring the identification and dedication of land for the future construction and operation of a new fire station in the community of Nipomo (Mitigation Measure PS/mm-1.1). Although designating a site for the fire station was a mitigation requirement of the EIR (Mitigation Measure PS/mm-1.1), San Luis Obispo County/CalFire confirmed a location within the Dana Reserve Specific Plan Area would be ideal. The applicant modified the project site plan to accommodate a fire station within the site (adjacent to the Collector A connection to Willow) and is not seeking PFF credits that the applicant would otherwise be entitled to in exchange for the land donation. Therefore, although PS/mm-1.1 does not require that the project actually construct a fire station (at an estimated cost of $15 million) or Sheriff's substation (at an estimated cost of $10 million), the Dana Reserve project would be required through the negotiated terms of the Development Agreement to provide additional contributions, above and beyond its normal fair share PFF, to help facilitate the County's development of these facilities. As discussed under PS Impact 1, the future development of these facilities may require additional CEQA review, which would be led by the County. CEQA mitigation requirements are limited by the nexus and rough proportionality rules established in *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994), which held that mitigation measures must have a reasonable "nexus" to the impact and be "roughly proportionate" both in nature and extent to the level of severity of the impact resulting from the proposed development. The EIR determined that the mitigation requirements in the EIR were appropriate based on the standards of the *Nollan* and *Dolan* cases, notwithstanding any additional contributions that could be negotiated through the terms of the Development Agreement. Requiring the project to actually construct the fire station, a $15 million project, or other public service facilities, above and beyond the payment of PFF and the additional contributions required through the Development Agreement would not be roughly proportionate to the project's contribution to the already established need for a new fire station and Sheriff's substation in Nipomo based on current and expected demand. Under CEQA, the focus on public services-related impacts is on the physical effects of the construction of new or expanded facilities to provide those services, the construction or expansion of which could result in physical changes to the environment. These potential environmental effects that could result from construction of a new fire facility in Nipomo are discussed in detail in Chapter 4.15 of the EIR, under the discussion of PS Impact 1. The need for additional services is not an environmental impact that CEQA requires a project to mitigate. Any requirement for expensive public capital projects would also inhibit the project's goals of providing a mix of housing, including affordable and workforce housing. For these reasons, the mitigation in the EIR is appropriate for the project and has the required nexus and rough proportionality to the project's potential impacts as required by state law.

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MR-3	**Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts** Several comments on the Draft EIR related to impacts to oak trees and/or oak woodland and Burton Mesa chaparral, including the inconsistency between existing County policies for protection of oak trees and the proposed loss of 4,000 oak trees and associated Burton Mesa chaparral habitat, the viability of numerous project alternatives that would reduce impacts to oak trees and Burton Mesa chaparral, and the inadequacy of identified mitigation to reduce the project's significant effects on oak trees. **Impacts to Oak Trees** These comments make apparent the challenge in balancing the project's basic underlying purpose of providing a range of housing types, including affordable and workforce housing, with the desire to reduce environmental impacts. The decision makers will have to balance the environmental effects of the project with the potential benefit of needed housing within the county. Minor revisions to the EIR have been made in response to these comments and can be reviewed as tracked changes in Section 4.4, *Biological Resources*, of the EIR. The comments and this master response will be made part of the administrative record and provided to local decision makers for their consideration. The EIR fully evaluated potential impacts related to oak tree removals, ultimately concluding the project would result in significant and unavoidable impacts due to the inability to maintain the diversity of oak woodland habitat within the range of Burton Mesa chaparral that currently exists in the Specific Plan Area. With regards to oak woodlands, the Class I impact was based on the lack of comparable oak woodland habitat within the range of Burton Mesa chaparral, which could be comparable to the unique and diverse oak woodland/Burton Mesa habitat within the Specific Plan Area. The EIR determined that in order to maintain the diversity of oak woodlands in the County, per County COSE Policy BR 3.3.1, mitigation for coast live oak woodlands should occur (1) adjacent to the conservation/restoration of Burton Mesa chaparral and (2) on sites with sandy soil conditions suitable to support the special-status plant species that occur in the Specific Plan Area. These requirements would be necessary to establish, restore, and/or maintain the habitat matrix created by the oak woodland and Burton Mesa chaparral on-site. The areas in which the two interact in the same way they do at the Dana Reserve are very limited; therefore, adequate mitigation was determined to be likely infeasible due to a variety of reasons (e.g., lack of available land, cost of implementation) and impacts were identified as significant and unavoidable. As reflected in Figure 4.4-14, the locations where Burton Mesa chaparral is known to occur in San Luis Obispo County is very limited. The project proposes to plant over 1,500 oak trees on-site to mitigate for the removal of and/or indirect impacts to oaks within the Specific Plan Area. The likelihood of successfully replanting oaks to the degree of magnitude anticipated (over 1,500 oaks), in the limited areas where Burton Mesa chaparral is known to exist, is very low. Not only are the occurrences of oak woodland on the Nipomo Mesa and the range of Burton Mesa chaparral both very limited, but the establishment of oak woodlands through replanting in off-site locations is also known to be challenging. This is in part why the project proposes the replanting of 1,500 oaks on-site, where it is known oaks can be successful. Appendix E of the EIR, Biological Resources Background Information, and in particular Appendix H of the Biological Report for the Dana Reserve Specific Plan, provides a thorough evaluation of the off-site locations where this mitigation could perhaps be achieved. The locations are limited, many are privately owned, and none are owned by the project applicant. Even if a suitable location were to exist, the success of recreating oak woodlands where they don't already exist is known to be challenging. Therefore, this mitigation was ultimately identified as likely infeasible, resulting in a Class I impact. However, that does not mean the project would not be required to mitigate significant adverse impacts to the greatest extent feasible as required by CEQA. Mitigation for significant impacts to oaks and oak woodlands is specifically discussed in Public Resources Code Section 21083.4 of the CEQA Statute. As discussed in Section 4.4, *Biological Resources,* substantial mitigation has been identified for impacts to coast live oaks. That mitigation has been specifically crafted to be in line with the requirements of Public Resources Code Section 21083.4, which requires a County to mitigate for the significant loss of oak woodlands by: (1) conserving oak woodlands through the use of conservation easements; (2) requiring replanting of oaks, though the replanting of oaks cannot fulfill more than 50% of the mitigation requirement; or (3) contributing funds to the Oak Woodland Conservation Fund. Mitigation Measure BIO/mm-15.1 requires the permanent protection of oak woodland through a permanent conservation easement to be managed by a qualified conservation organization approved by the County, such as The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, Cambria Land Trust, or the California Department of Fish and Wildlife. The project proposes to meet this mitigation requirement through the permanent conservation of approximately 388 acres, including 238 acres of Coast live oak woodland at an off-site mitigation site (known as Dana Ridge). The project would remove approximately 75.3 acres of oak woodland; therefore, the conservation of 238 acres of oak woodland at Dana Ridge would permanently protect oak woodlands at that location at a greater than 3:1 ratio to oak woodland removed within the Specific Plan Area. This requirement is consistent with Public Resources Code Section 21083.4 mitigation option (1). The loss of oak forest would similarly be mitigated for at a 2.5:1 ratio. In addition, Mitigation Measures BIO/mm-18.1 through BIO/mm-18.4 provides an extensive set of mitigation requirements to minimize oak removal within the Specific Plan Area; protect oak trees to be retained onsite; require replanting at a 4:1 ratio of oaks not mapped within oak woodland or oak forest; and replanting requirements for indirect impacts to oaks to be retained onsite. As currently proposed, the project would be

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required to plant approximately 1,500 oak trees within the Specific Plan Area. This requirement is consistent with Public Resources Code Section 21083.4 mitigation option (2).

Public Resources Code Section 21083.4(e)(1) specifies that:

> A lead agency that adopts, and a project that incorporates, one or more of the measures specified in this section to mitigate the significant effects to oaks and oak woodlands shall be deemed to be in compliance with this division only as it applies to effects on oaks and oak woodlands.

Therefore, per the requirements of Public Resources Code Section 21083.4, the identified mitigation would be sufficient to comply with CEQA as it applies to oaks and oak woodlands.

A variety of mitigation measures has been identified to address impacts, including off-site mitigation for coast live oak woodland; an on-site tree protection plan for trees retained; a tree replacement plan; protection for on-site oak woodland resources; off-site preservation for oak woodlands; and oak tree monitoring. Impacts in which identified mitigation may not be sufficient to feasibly reduce impacts to less than significant have been classified as significant and unavoidable (Class I) for the reasons described above. Even though mitigation to reduce impacts to less-than-significant may be insufficient, the project is still required to mitigate impacts to the greatest extent feasible under CEQA through implementation of Mitigation Measures BIO/mm-3.1, BIO/mm-15.1, and BIO/mm-18.1 through BIO/mm-18.4.

Impacts to Burton Mesa Chaparral

The EIR also fully evaluated potential impact to Burton Mesa chaparral under Bio Impact 14. Approximately 36 acres of the 288-acre project area is characterized as Burton Mesa chaparral. The project would remove 35 acres of Burton Mesa chaparral and preserve 1 acre of this habitat on-site. As described in the EIR, under the current project design, on-site mitigation opportunities are limited. In addition, Burton Mesa chaparral is a fire prone and fire dependent natural community, achieving its highest species diversity following fires (CDFG 2007). Incorporating fire, in the form of controlled burns, as a habitat management tool to maintain species diversity is challenging in an urban setting. Given this management constraint, off-site conservation of Burton Mesa chaparral would be the best option to offset significant impacts. However, due to the limited range of this vegetation type and the limited availability of off-site mitigation parcels as further described above, implementing off-site mitigation may also not be feasible. Therefore, the EIR concluded that impacts to this habitat would be significant and unavoidable.

Mitigation Measure BIO/mm-14.1 includes a requirement that Burton Mesa chaparral shall be mitigated through a combination of conservation, enhancement, restoration, and recreation of Burton Mesa chaparral to avoid any net loss of habitat quality. Burton Mesa chaparral habitat within the Specific Plan Area has been subject to periodic mowing since at least the 1930s and is in poor condition. There is disagreement among experts as to whether this habitat should have been characterized as Burton Mesa chaparral due to the lack of the characteristic high coverage of sand mesa manzanita in the shrub canopy. However, because sand mesa manzanita is present (albeit at very low levels) in the shrub layer at Dana Reserve, which occurs on old, stabilized dune sands on the Nipomo Mesa, the EIR concluded it was not unreasonable to characterize the habitat as Burton Mesa chaparral.

Recognizing mitigation within San Luis Obispo County may not be feasible, the EIR required mitigation in Santa Barbara County at a higher ratio. Due to the very limited range of Burton Mesa chaparral (within the stabilized sand dunes of northern Santa Barbara County and southern San Luis Obispo County), mitigation within that limited range is considered like-for-like, consistent with CEQA requirements. Though that mitigation was ultimately determined to likely be infeasible for the reasons discussed above, the Class I impact determination does not absolve the project from the requirement to avoid and minimize impacts to the greatest extent feasible per the requirements of CEQA. Therefore, Mitigation Measure BIO/mm-14.1 has been revised to include minimum performance standards for the permanent protection, enhancement, and/or restoration of Burton Mesa chaparral as follows to avoid any net loss of habitat quality:

The applicant shall mitigate for the loss of Burton Mesa chaparral to achieve a performance standard of *no net loss of habitat quality*. As described in the EIR, this habitat has been subjected to periodic mowing since at least the 1930s and is currently in poor condition, with less than 2% cover of constituent species (i.e., sand mesa manzanita). The performance standard shall be achieved through a combination of conserving, enhancing, restoring, and/or re-creating Burton Mesa chaparral removed by the project at the following mitigation ratios:

a. Conservation of currently unprotected Burton Mesa chaparral habitat in excellent condition at a 1.5:1 ratio;
b. Enhancement of protected Burton Mesa chaparral habitat in moderate to poor condition at a 2:1 ratio;
c. Restoration of damaged protected Burton Mesa chaparral habitat at a 0.5:1 ratio; and/or
d. Recreate high-quality Burton Mesa chaparral at a 0.25:1 ratio in appropriate habitat that has been completely disturbed (e.g., abandoned farmland).

Based on the 35 acres of Burton Mesa chaparral to be removed by the project, and depending on the mitigation option(s) utilized to mitigate impacts, Burton Mesa chaparral would be mitigated through the conservation, enhancement, restoration, and/or recreation of between 8.75 acres and 70 acres of Burton Mesa chaparral, calculated as follows:

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a. Conservation of unprotected Burton Mesa chaparral habitat in excellent condition at a 1.5:1 ratio (52.5 acres conserved:35 acres removed);
b. Enhancement of protected Burton Mesa chaparral habitat in moderate to poor condition at a 2:1 ratio (70 acres enhanced:35 acres removed);
c. Restoration of damaged protected Burton Mesa chaparral habitat at a 0.5:1 ratio (17.5 acres restored:35 acres removed); and/or
d. Recreate high-quality Burton Mesa chaparral at a 0.25:1 ratio in appropriate habitat that has been completely disturbed (8.75 acres recreated:35 acres removed).

California courts have established that adequate mitigation under CEQA and the California Endangered Species Act (CESA) need not always require acre-for-acre mitigation. In *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1038 (commonly referred to as the "ECOS" case), the court upheld a Habitat Conservation Plan that required mitigation through purchase of 0.5 acre of habitat reserves for every 1 acre that was to be development. The court reasoned, in part, that the habitat to be developed was of limited value, whereas the habitat to be preserved was large and biologically viable, would provide higher quality habitat than the lands to be developed, and would provide permanently protected habitat managed for the covered species.

This requirement would be a minimum requirement for the project to be verified by the County regardless of the potential infeasibility of additional mitigation requirements for the habitat as described in BIO Impact 14. This requirement establishes performance standards that would achieve no net loss of habitat quality consistent with the findings of the ECOS case and would ensure impacts would be mitigated to the greatest extent feasible. Minor revisions to BIO Impact 14 have been made in response to these comments and can be reviewed in tracked changes in Section 4.4 of the EIR.

Carbon Sequestration

The California Emissions Estimator Model (CalEEMod) was used to calculate potential GHG impacts in the EIR. CalEEMod includes default settings to account for potential GHG impacts associated with vegetation removal, including those related to the loss of GHG reductions associated with carbon sequestration. Subsequent to circulation of the Draft EIR, and in coordination with the SLOAPCD, air quality and GHG emissions modeling was modified to address minor changes in model inputs, updated SLOAPCD guidance, and other refinements in statewide guidance regarding the evaluation of GHG impacts in CEQA documents. The updated model outputs and analysis have been added to Appendix D. The updated modeling resulted in a lower (more stringent) GHG efficiency significance threshold (2.9 $MTCO_2e$/year) compared to the one utilized in the Draft EIR (3.4 $MTCO_2e$/year). The updated modeling also more specifically identifies GHG emissions associated with the amortized loss of sequestration emissions based on the anticipated loss of approximately 266.5 acres of vegetation, including 21.7 acres of coast live oak forest, 75.3 acres of coast live oak woodland, 35.0 acres of Burton Mesa chaparral, 125.0 acres of California perennial grassland, 3.2 acres of annual brome grassland, 5.1 acres of Mediterranean California naturalized perennial grassland on-site, as well as off-site impacts to approximately 0.05 acres of scrub land and 0.81 acres of grassland. With these changes, the revised modeling confirmed and verified the conclusions in the Draft EIR related to the project's potential effects related to GHG impacts. As indicated in updated Tables 4.8-5 and 4.8-6 in the EIR and Appendix D, even when measured against the reduced GHG efficiency significance threshold of 2.9 $MTCO_2e$/year, and specifically accounting for an amortized loss of sequestration emissions of 394.9 $MTCO_2e$/year, the project would still result in emissions within the acceptable threshold for GHG emissions with implementation of identified mitigation. Therefore, potential impacts were verified to be less than significant with mitigation and no further changes to the EIR analysis are required.

Alternatives Evaluated to Reduce Impacts to Biological Resources

The EIR also identified and included analysis of several reduced project alternatives that would avoid and/or reduce impacts to oak trees and other biological resources.

A range of project alternatives was evaluated in Chapter 5, *Alternatives Analysis,* to evaluate ways in which the project's significant and unavoidable impacts could be reduced or avoided. In addition to the No Project Alternative, Alternatives 2, 3, and 4 all include modified site plans which would result in reduced development footprints and an associated reduction in the number of oak trees that would be impacted by the project. The EIR determined that the No Project Alternative and Alternatives 2, 3, and 4 would all result in reduced impacts to biological resources compared to the proposed project, resulting in impacts that could be avoided or reduced to less than significant levels with mitigation. Alternative 1 would also reduce impacts to oak trees, by retaining approximately 4 acres of oak woodland habitat in the northeastern portion of the site, ultimately reducing the number of impacted oak trees. However, due to the similar intensity and density of development under Alternative 1, the remaining extent of impacts to biological resources was determined to remain significant and unavoidable, similar to the proposed project.

Under Alternative 2, approximately 137 acres of land would be retained for open space, reducing the number of impacted oak trees and native habitat (i.e., Burton Mesa chaparral) at the project site. Based on the significantly reduced development footprint, if properly situated, Alternative 2 could largely avoid direct removal and impacts to oak woodland and Burton Mesa chaparral. Buildout of the site under Alternative 3 would include lower density clustered residential development, which would significantly reduce the horizontal extent/footprint of disturbance and the amount of impacted oak woodland and Burton Mesa chaparral habitat at the project site. Under

Master Response #	Master Response

Alternative 4, buildout would be predominantly limited to areas of non-native grassland and the potential to disturb special-status plant and wildlife species would be substantially reduced compared to the proposed project; however, minimized impacts to special-status plant and wildlife species and natural communities, including oak woodland and Burton Mesa chaparral, would continue to occur.

The EIR identified that under each of these alternatives, impacts to oak trees, oak habitat, and other sensitive habitat within the Specific Plan Area would be substantially avoided or minimized. However, the EIR also determined, due to the substantial reduction in the number of housing units under each of these alternatives, the number of affordable units and affordability of market rate units would be significantly decreased in order to provide necessary financing for infrastructure and other improvements needed for site development. Therefore, each of these reduced project alternatives would fail to meet some of the basic project objectives, including providing a mix of housing types, including affordable homes and workforce housing.

Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. Pursuant to CEQA Guidelines Sections 15042 and 15043, the lead agency's decision-making body will review the CEQA document prepared for the proposed project and may reject the project if necessary in order to avoid one or more significant effects on the environment, or approve the project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant impact and identified benefits from the project outweigh the policy of avoiding significant environmental impacts of the project.

Project Modifications Since Circulation of the Draft EIR

Subsequent to circulation of the Draft EIR and in response to public and agency comments, the County and project applicant have coordinated extensively on ways to modify the proposed project to further avoid impacts to oaks (and other significant environmental impacts), while still meeting the basic project objectives for a mix of housing types, including affordable and workforce housing. As a result, the following changes have been incorporated into a revised site plan:

a. Relocation of the Collector A connection to Willow Road to APN 091-301-029. This modification would avoid removal of 200 oak trees.

b. Reorientation of Neighborhood 9 to the north to avoid removal of oaks along the northern edge of the oak forest ridge/Open Space area. This modification would avoid removal of 69 oak trees.

c. Split of 10-acre Neighborhood 10 into 5-acre Neighborhood 10A to remain in its original location, configured to avoid oak trees, and a new 5-acre Neighborhood 10B to be located centrally within the Specific Plan Area in an area of predominantly non-native grassland adjacent to the proposed neighborhood park. This modification would avoid removal of 186 oak trees at the original Neighborhood 10 location.

d. Redesign/reimagination of the proposed 10-acre public neighborhood park to be an approximately 7.5-acre passive public park with limited amenities (public restrooms, trails, picnic tables, small parking lot, etc.). This modification would avoid removal of 110 oak trees at the modified park location. The trees to be preserved include two high-quality (not previously cut down) stands of oaks at the south end of the proposed park location, which would be preserved in perpetuity through a conservation/open space easement.

e. Re-review and re-design of grading plans with a focus on restricting limits of disturbance to avoid removal of oak trees. This modification would avoid removal of 293 oak trees, primarily due to restrictions at pocket park locations and trail alignment around the perimeter of the Specific Plan Area.

These modifications would result in the net avoidance of an additional 858 oak trees. While the project would still result in a significant impacts to oak trees, considerable effort has been put towards minimizing impacts throughout the site to the greatest extent feasible through a modified site design. These project modifications, and other modifications incorporated into the project since circulation of the Draft EIR to further avoid and minimize impacts, are described in detail in Chapter 10.

9.2 AGENCY COMMENT LETTERS AND RESPONSES

The following agencies have submitted comments on the Draft EIR.

Table 9.2-1. Agency Comments

Respondent	Code	Contact Information	Page
Governor's Office of Planning and Research State Clearinghouse EIR posted: 06/16/2022	SCH	1400 10th Street Sacramento, CA 95814	9.2-3
California Department of Toxic Substances Control Letter dated: 06/24/2022	DTSC	Site Evaluation and Remediation Unit Site Mitigation and Restoration Program 8800 Cal Center Drive Sacramento, California 95826-3200 *Contact: Gavin McCreary, M.S., Project Manager*	9.2-7
Cuesta College Letter dated: 07/12/2022	Cuesta	P.O. Box 8106 San Luis Obispo, CA 93403-8106 *Contact: Jill Stearns, Superintendent/President*	9.2-13
California Department of Water Resources Letter dated: 07/18/2022	DWR	Division of Operations and Maintenance damanvir.badyal@water.ca.gov *Contact: Daman Badyal, P.E., SWP Right of Way Section (Unit) Manager*	9.2-15
California Department of Parks and Recreation Letter dated: 07/21/2022	DPR	**Oceano Dunes District** 340 James Way, Suite 270 Pismo Beach, CA 93449 *Contact: Kevin Pearce, Acting District Superintendent*	9.2-17
San Luis Obispo County Air Pollution Control District Letter dated: 07/27/2022	APCD	3433 Roberto Court San Luis Obispo, CA 93401 *Contact: Vince Kirkhuff, Air Quality Specialist*	9.2-20
Coastal San Luis Resource Conservation District Letter dated: 07/31/2022	RCD	1203 Main Street, Suite B Morro Bay, CA 93442 *Contact: Jackie Crabb, Executive Director*	9.2-30
California Department of Transportation Letter dated: 08/01/2022	Caltrans	District 5 50 Higuera Street San Luis Obispo, CA 93401-5415 *Contact: Jenna Schudson, Development Review Coordinator*	9.2-33
County of San Luis Obispo Parks and Recreation Department Letter dated: 08/01/2022	SLOPRD	1144 Monterey Street, Suite A San Luis Obispo, CA 93408 *Contact: Elizabeth Kavanaugh, Parks and Trails Planner*	9.2-37
Nipomo Community Services District (via RWG Law) Letter dated: 08/01/2022	NCSD	847 Monterey Street, Suite 207 San Luis Obispo, California 93401 *Contact: Craig Steele, Counsel*	9.2-50
San Luis Obispo Council of Governments Letter dated: 08/01/2022	SLOCOG	1114 Marsh Street San Luis Obispo, CA 93401 *Contact: Sara Sanders, Transportation Planner*	9.2-166
San Luis Obispo Local Agency Formation Commission Letter dated: 08/01/2022	LAFCO	1042 Pacific Street, #A San Luis Obispo, CA 93401 *Contact: Rob Fitzroy, Executive Officer*	9.2-170

Respondent	Code	Contact Information	Page
California Department of Fish and Wildlife Letter dated: 08/03/2022	CDFW	Central Region 1234 East Shaw Avenue Fresno, California 93710 *Contact: Julie Vance, Regional Manager*	9.2-172

9.2.1 California Governor's Office of Planning and Research State Clearinghouse

Dana Reserve Specific Plan

Summary

SCH Number	2021060558
Lead Agency	San Luis Obispo County
Document Title	Dana Reserve Specific Plan
Document Type	EIR - Draft EIR
Received	6/16/2022
Present Land Use	Use: undeveloped/grazing Designation: Residential Rural (RR)
Document Description	The proposed project includes a request for a Specific Plan, Conditional Use Permit for Oak Tree Removal and Grading/Impervious Surfaces, Vesting Tentative Tract Map 3159, Development Agreement, annexation into the Nipomo Community Services District service area, and County-initiated General Plan Amendment to allow for the phased development of the Dana Reserve Specific Plan Area. The DRSP is a primarily residential project with a majority of the area designated for residential uses, which would accommodate up to 1,289 single- and multi-family units. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the approximately 288-acre Specific Plan Area.

Contact Information

Name	Jennifer Guetschow
Agency Name	County of San Luis Obispo
Job Title	Supervising Planner
Contact Types	Lead/Public Agency
Address	976 Osos Street, Room 200 San Luis Obispo, CA 93408
Phone	(805) 788-2352
Email	jGuetschow@co.slo.ca.us
Name	Emily Creel
Agency Name	SWCA Environmental Consultants
Job Title	Planning Team Lead
Contact Types	Consulting Firm
Address	1422 Monterey Street, Suite B200 San Luis Obispo, CA 93401
Phone	(805) 539-2870

SCH-1

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Email	ecreel@swca.com
Name	Nick Tompkins
Agency Name	Dana Reserve, LLC / NKT Development, LLC
Job Title	Project Applicant
Contact Types	Project Applicant
Address	648 South Higuera Street, Suite B San Luis Obispo, CA 93401
Phone	(805) 478-9009
Email	Nick@nktcommercial.com

Location

Coordinates	35°2'42.05"N 120°30'8.03"W
Cities	Nipomo
Counties	San Luis Obispo
Regions	Southern California, Unincorporated
Cross Streets	Willow Road and Hetrick Avenue
Zip	93444
Total Acres	288
Parcel #	091-301-030, -031, -073
State Highways	US 101
Railways	N/A
Airports	N/A
Schools	Nipomo High School, Lange Elementary
Waterways	Nipomo Creek
Township	11N
Range	34W
Section	7 1218
Base	MDBS

Notice of Completion

State Review Period Start	6/16/2022
State Review Period End	8/1/2022
State Reviewing Agencies	California Air Resources Board (ARB), California Coastal Commission (CCC), California Department of Education, California Department of Fish and Wildlife, Marin Region 7 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Housing and Community Development (HCD), California Department of

SCH-1
(cont'd)

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	Parks and Recreation, California Department of Transportation, District 5 (DOT), California Department of Water Resources (DWR), California Governor's Office of Emergency Services (OES), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Central Coast Region 3 (RWQCB), California State Lands Commission (SLC), Department of General Services (DGS), Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Drinking Water, District 6, State Water Resources Control Board, Division of Water Quality, Department of Toxic Substances Control, California Department of Fish and Wildlife, Central Region 4 (CDFW)
State Reviewing Agency Comments	Department of Toxic Substances Control, California Department of Fish and Wildlife, Central Region 4 (CDFW)
Development Types	Residential (Units 1289, Acres 183), Commercial (Sq. Ft. = max. potential floor area; employees based on max sf)(Sq. Ft. 203000, Acres 22.3, Employees 273), Recreational (60.8 acres of park/recreation, open space, trails, and basins), Transportation:Local Road (21.9 acres)
Local Actions	General Plan Amendment, Specific Plan, Use Permit, Land Division (Subdivision, etc.), Annexation, Development Agreement
Project Issues	Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, Wildfire
Local Review Period Start	6/16/2022
Local Review Period End	8/1/2022

SCH-1 (cont'd)

Attachments

Draft Environmental Document [Draft IS, NOI_NOA_Public notices, OPR Summary Form, Appx,]	DRSP Draft EIR_June 2022_Vol 1_EIR PDF 41174 K DRSP Draft EIR_June 2022_Vol 2_Apps A-E PDF 89091 K DRSP Draft EIR_June 2022_Vol 3_Apps F-K PDF 88637 K Notice of Availability - DEIR for SUB2020-00047 PDF 132 K SCH Summary_Form_for_Document_Submittal PDF 196 K
Notice of Completion [NOC] Transmittal form	Notice of Completion (NOC) PDF 359 K
State Comment Letters [Comments from state reviewing agencies]	2021060558_CDFW Comment PDF 607 K 2021060558_DTSC Comment PDF 357 K

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9.2.1.1 Response to Posting from California Governor's Office of Planning and Research State Clearinghouse

Comment No.	Response
SCH-1	The Draft EIR was received by the California Governor's Office of Planning and Research State Clearinghouse and the public review period began on June 16, 2022. The Draft EIR, Draft EIR Appendices, Notice of Completion, Notice of Availability, and State Clearinghouse Summary Form were made available for public review at https://ceganet.opr.ca.gov/2021060558/3 for the full duration of the 45-day review period.

9.2.2 California Department of Toxic Substances Control

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 24, 2022

Ms. Jennifer Guetschow
County of San Luis Obispo
976 Osos Street, Room 300
San Luis Obispo, CA 93408
JGuetschow@co.slo.ca.us

DRAFT ENVIRONMENTAL IMPACT REPORT FOR DANA RESERVE SPECIFIC PLAN – DATED JUNE 2022 (STATE CLEARINGHOUSE NUMBER: 2021060558)

Dear Ms. Guetschow:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for the Dana Reserve Specific Plan (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

The EIR refers to the Hazardous Waste and Substances Sites List commonly known as the Cortese List. Not all sites impacted by hazardous waste or hazardous materials will be found on the Cortese List. DTSC recommends consulting with other agencies that may provide oversight to hazardous waste facilities and sites in order to determine a comprehensive listing of all sites impacted by hazardous waste or hazardous materials within the Project area. DTSC hazardous waste facilities and sites with known or suspected contamination issues can be found on DTSC's EnviroStor data management system. The EnviroStor Map feature can be used to locate hazardous waste facilities and sites for a county, city, or a specific address. **DTSC-1**

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the EIR:

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1. The EIR should acknowledge the potential for historic or future activities on or near the Project site to result in the release of hazardous wastes/substances on the Project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight. **DTSC-2**
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil, DTSC recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the Project described in the EIR. **DTSC-3**
3. If any projects initiated as part of the proposed Project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to *DTSC's 2001 Information Advisory Clean Imported Fill Material*. **DTSC-4**
4. If any sites included as part of the proposed Project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)*. **DTSC-5**

DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please visit DTSC's Site Mitigation and Restoration Program page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at DTSC's Brownfield website.

Ms. Jennifer Guetschow
June 24, 2022
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If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,



Gavin McCreary, M.S.
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

9.2.2.1 Response to Letter from California Department of Toxic Substances Control

Comment No.	Response
DTSC-1	The comment states that a review of the Hazardous Waste and Substances Sites List (Cortese List) should be supplemented with review of databases developed by other agencies that may have oversight of hazardous waste facilities and sites including the DTSC's EnviroStor Database. The project site is located within the southwestern portion of the unincorporated area of San Luis Obispo County. The project site includes the Specific Plan Area (Dana Reserve), and the location of various offsite transportation, water, and wastewater improvements (see Figures 2-3 through 2-7 in Chapter 2, Project Description). The exact location of proposed off-site transportation improvements and NCSD water system and wastewater system improvements is currently not known; however, proposed off-site improvements are anticipated to be located within previously developed roadways and other disturbed areas along North Oakglen Avenue, East Tefft Street, North Frontage Road, Pomeroy Road, and Willow Road, among others. EIR Section 4.9, *Hazards and Hazardous Materials*, presents the baseline hazards conditions for the Specific Plan Area and off-site improvement areas and their surroundings. The summaries under the "Recorded Hazardous Materials Sites" subsections of EIR Section 4.9.1 (Existing Conditions) for the Specific Plan Area and the off-site improvement areas cite the databases queried. The DTSC EnviroStor Database as well as the SWRCB GeoTracker Database and the CDOC Geologic Energy Management Division (CalGEM) Well Finder Map Database were all queried and reviewed. A map of known hazardous materials sites, sensitive uses, and hazards within a 1,000-foot buffer of the Specific Plan Area and off-site improvement areas is presented in EIR Figure 4.9-1. No hazardous sites were identified within the Specific Plan Area; however, there are several closed cleanup sites and one open cleanup program site located in proximity to off-site water and/or wastewater improvements. These sites are discussed under HAZ Impact 7. The EIR identified a potentially significant impact (HAZ Impact 7) due to the fact that off-site improvements would be located near hazardous materials sites. Mitigation Measure HAZ/mm-7.1 requires that, prior to any vegetation removal, demolition activities, or earth-moving activities within 1,000 feet of any open hazardous materials site, the project contractor shall prepare and implement a Hazardous Materials Management Plan that details procedures that will be taken to ensure the appropriate handling, stockpiling, testing, and disposal of excavated materials to prevent the inadvertent release of contaminated soil and demolished materials to the environment during construction activities. The specific requirements of the Hazardous Materials Management Plan are detailed under HAZ Impact 7. No changes to the Draft EIR are required in response to this comment.
DTSC-2	The comment states that the EIR should acknowledge historic and future activities on or near the project site with potential to result in release of hazardous waste/substances on the project site. The commenter further states that the EIR should identify the mechanism(s) to initiate investigation and/or remediation as well as the agency responsible for regulatory oversight in the event releases have or may occur on the site. EIR Section 3.1.2.1, Existing Site Characteristics, presents the baseline conditions for the Specific Plan Area and off-site improvement areas and their surroundings. The Specific Plan Area is largely undeveloped, with the exception of unpaved ranch roads traversing portions of the site. Off-site improvement areas are anticipated to be located within previously paved roadways, intersections, and road shoulder areas within existing County rights-of-way and other disturbed areas on nearly level to gently sloping land throughout the community of Nipomo. As discussed under Response DTSC-1, above, and under HAZ Impact 7, the EIR identified a potentially significant impact associate with the construction of off-site water and wastewater facilities in proximity to a known hazardous materials site. Mitigation was required (HAZ/mm-7.1) that describes when additional investigation would be required (prior to ground disturbance within 1,000 feet of a cleanup site) and establishes requirements for notification and reporting procedures, including with local agencies (e.g., California Department of Forestry and Fire Protection, County of San Luis Obispo Environmental Health Services). The hazards analysis on EIR under HAZ Impact 1 and HAZ Impact 2 identifies the applicable federal, state and local regulations that each future development as well as associated off-site improvement activities would be required to comply with such as CCR Title 22 for the routine use, storage, and transport of hazardous materials and HSC Division 20, Chapter 6.95 which requires development of a Hazardous Materials Response Plan. The agencies associated with the compliance and monitoring are also identified, e.g., the San Luis Obispo County Environmental Health Services and the Integrated Waste Management Agency. As noted, construction-related and operational impacts associated with buildout of the Specific Plan Area and completion of proposed off-site transportation, water, and wastewater system improvements at off-site areas would be less than significant due to required compliance with existing regulations and mitigation measures. The hazards analysis under HAZ Impact 3 and HAZ Impact 4 notes that required compliance with existing regulations such as CCR Title 22 would reduce the potential for hazardous substances exposure due to foreseeable upset or accident conditions associated with the routine use, storage, and transport of hazardous materials during construction. As noted under HAZ Impact 3 the potential occurrence of aerially

Comment No.	Response
	deposited lead (ADL) in the Specific Plan Area is low due to the lack of paved roads; however, the eastern boundary of the Specific Plan Area extends parallel to US 101 where ADL is known to occur. Because buildout of the Specific Plan Area and the proposed off-site transportation, water, and wastewater system improvements would not occur within the Caltrans right-of-way or within 30 feet of US 101, the potential for the disturbance of substantial amounts of ADL is low. Although the Specific Plan Area is not located in an area with potential for soils containing naturally occurring asbestos (NOA) due to the proximity of areas with potential for NOA to occur including those areas proposed for off-site transportation, water, and wastewater improvements, Mitigation Measure AQ/mm-7.1 is identified to reduce potential exposure to NOA during future ground-disturbing activities. Mitigation requires a geologic evaluation prior to grading and development of an Asbestos Dust Mitigation Plan if NOA is found to be present. The agency associated with the compliance and monitoring if NOA is present is also identified, i.e., the San Luis Obispo County Air Pollution Control District. Thus, construction-related and operational impacts associated with build-out of the Specific Plan Area would be less than significant due to required compliance with existing regulations and implementation of identified mitigation measures. In addition, due to the varied locations for the off-site transportation, water, and wastewater system improvements, Mitigation Measures BIO/mm-16.1, BIO/mm-16.2, and BIO/mm-16.3 were identified to minimize the risk of hazardous material contamination near sensitive areas (e.g., drainages and Nipomo Creek near the location of proposed water system improvements). Section 4.2, *Agriculture and Forestry Resources*, of the EIR, under AG Impact 1, reports that the Specific Plan Area has been utilized periodically for seasonal grazing over the past 100 years with limited intense agricultural operations due to lack of irrigation and limited dryland farming success. As noted in Section 4.9.1, *Existing Conditions*, in Section 4.9, *Hazards and Hazardous Materials*, although the Specific Plan Area has not historically been used for agricultural purposes it is highly likely that nearby active agricultural lands, including, but not limited to, covered and uncovered row crops located approximately 250 feet to the east (on the opposite side of US 101 and adjacent to Nipomo Creek) and 0.25 mile to the northwest and southwest, utilize pesticides and/or fertilizers during typical operations. Proposed off-site water system improvements are also located adjacent to several active agricultural operations, including, but not limited to, uncovered row crops located along Tefft Street. Due to the lack of present or historic intensive agricultural activities within the Specific Plan Area or the location of off-site improvements, substantial levels of residual agricultural chemicals including pesticides, arsenic, and herbicides are not expected to be present. No changes to the Draft EIR are required in response to this comment.
DTSC-3	The comment states that tailpipe emissions for vehicles using leaded gasoline resulted in aerially deposited lead (ADL) in and along roadways throughout the State of California. The commenter recommends soil testing for ADL prior to any intrusive activities for the Project that are described in the EIR. As discussed under Response DTSC-2, above, ADL is discussed under EIR Section 4.9.1, *Existing Conditions*, for the Specific Plan Area and the off-site improvement areas. The Specific Plan Area's eastern boundary is coterminous with the Caltrans ROW along US 101 and extends to within approximately 30 feet of the paved roadway. Off-site improvement areas would utilize an existing culvert to cross US 101 and would not require ground disturbance within 30 feet of the traveled roadway. Therefore, the potential for disturbance of substantial levels of ADL is low. As discussed under HAZ Impact 3 for the Specific Plan Area: > The Specific Plan Area is currently undeveloped and does not consist of any internal paved roads that would have been heavily used during the time lead was a component in gasoline; therefore, the potential for ADL to occur within the Specific Plan Area is very low. However, the eastern boundary of the site extends adjacent to US 101 and includes areas within approximately 30 feet of the paved roadway. ADL is known to occur in road shoulder areas along US 101 in the project vicinity and elsewhere in the state; however, the highest lead concentrations are usually found within 10 feet of the edge of the pavement and within the top 6 inches of the soil. In some cases, lead is as deep as 2 to 3 feet below the surface and can extend 20 feet or more from the edge of pavement. No project development would occur within the Caltrans ROW or within 30 feet of US 101; therefore, the potential for the disturbance of substantial amounts of ADL as a result of development within the Specific Plan Area is low. Therefore, potential impacts related to ADL that could create a significant hazard to the public would be less than significant. As discussed under HAZ Impact 4 for the off-site improvement areas: > Proposed off-site wastewater system improvements would require ground disturbance approximately 35 feet from US 101, along North Frontage Road, and proposed off-site water system improvements would occur within a previously developed culvert under US 101. ADL is known to occur in road shoulder areas along US 101 in the project vicinity and elsewhere in the state. The highest lead concentrations are generally located within 10 feet of the edge of the pavement and within the top 6 inches of the soil. In some cases, lead is as deep as 2 to 3 feet below the surface and can extend 20 feet or more from the edge of pavement. Proposed off-site wastewater system improvements would not occur within 30 feet of US 101 and is not anticipated to disturb substantial amounts

Comment No.	Response
	of ADL. In addition, proposed off-site water system improvements would occur within a previously developed culvert, which would avoid additional soil disturbance within 30 feet of US 101 that could result in potential disturbance of ADL. Since proposed improvements would not require soil disturbance within 30 feet of US 101, the potential for the disturbance of substantial amounts of ADL as a result of off-site improvements is low. Therefore, potential impacts related to the accidental release of ADL-contaminated soils would be less than significant. No changes to the Draft EIR are required in response to this comment.
DTSC-4	The comment states that, if soil import is necessary, soil sampling should be conducted in accordance with DTSC's 2001 Information Advisory Clean Imported Fill Material to ensure that imported soil is free of contamination. Due to the phasing of the project and the size of the Specific Plan Area an on-site import/export balance of soil would be expected, i.e., on-site borrow areas would be identified within the DRSP development footprint. Therefore, it is currently anticipated that the project would not require import of soils from an off-site location. As noted in EIR Section 4.9, Hazards and Hazardous Materials, based on the site's history as grazing land and open space on-site cut and fill associated with grading and excavating for site preparation and road and utility installation for development of the Specific Plan Area would not be expected to encounter contaminated soils. However, if soil import is necessary, as discussed in EIR Section 4.7, *Geology and Soils*, under GEO Impact 5 and specifically under bullet 6 of Mitigation Measure GEO/mm-5.2 (Grading) all import materials are required to be "approved" before being used. Mitigation Measure GEO/mm-5.2 (Grading) has been further clarified as follows: "6. On-site material and approved import materials evaluated and approved by the geotechnical engineer pursuant to the DTSC's *2001 Information Advisory Clean Imported Fill Material* may be used as general fill. All imported soil shall be free of contamination and non-expansive. The proposed imported soils shall be evaluated by the geotechnical engineer before being used, and on an intermittent basis during placement on the site." No further changes to the Draft EIR are required in response to this comment.
DTSC-5	The comment states that proper investigation for pesticides should be discussed in the EIR in accordance with DTSC's 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision) for any development areas previously used for agricultural, weed abatement, or related activities. As discussed in Response to DTSC-2. The Specific Plan Area has historically supported grazing activities but has limited agricultural production due to lack of irrigation and limited dryland farming success. Therefore, the site has not supported historical uses that that would have resulted in residual agricultural chemicals including pesticides, arsenic, and herbicides to be present in the on-site soils. Similarly, off-site improvement areas are located almost entirely within existing County rights-of-way and have not supported intensive agricultural operations in the past. No changes to the Draft EIR are required in response to this comment.

9.2.3 Cuesta College

CUESTA COLLEGE

SAN LUIS OBISPO COUNTY COMMUNITY COLLEGE DISTRICT

Jill Stearns, Ph.D., Superintendent/President

July 12, 2022

Department of Planning and Building
Attn: Planning Commission
976 Osos St., Room 300
San Luis Obispo, CA 93408

Dear Commissioners,

I am writing on behalf of the San Luis Obispo County Community College District/Cuesta College, to express support for the proposed development of Dana Reserve (Cañada Ranch).

Cuesta College provides open access to exceptional quality higher education in San Luis Obispo County. The educational programs at Cuesta College include university transfer preparation, career education, and technical upskilling for job advancement. The Dana Reserve project supports that same community and is in line with the institution's mission, vision, and values.

Cuesta College has been searching for a suitable South County location to provide improved access to higher education for residents south of the Shell Beach straits and the surrounding communities. The Dana Reserve Specific Plan includes a 4-acre improved parcel that will provide for a South County site for Cuesta College classes and services. This offering creates access for students that otherwise may not attend due to lack of transportation by expanding the reach of the Cuesta Promise.

The plan also includes a non-profit day care facility near the Cuesta Campus, creating more opportunities for parents with young children to attend classes and childcare options for Cuesta employees. In addition to the benefits of a South County campus for Cuesta College, the increase in available housing is significantly important to 1,100 members of the Cuesta College workforce and will improve the College's opportunity to attract and retain talented employees.

For these reasons, along with the preservation of oak habitat, open space, recreation areas, trails, and associated infrastructure and other planned services, Cuesta College strongly supports the Dana Reserve Specific Plan.

Cuesta-1

Sincerely,

Jill Stearns, Ph.D.
Superintendent/President

Build Your Future

Cuesta College P.O. Box 8106, San Luis Obispo, CA 93403-8106 (805) 546-3118 www.cuesta.edu

9.2.3.1 Response to Letter from Cuesta College

Comment No.	Response
Cuesta-1	The comment expresses support for the proposed project and specifically the education and childcare components and the fact that the project would provide an increase in available housing for the Cuesta College workforce and improve the College's ability to attract and retain talented employees. The commenter does not raise any issues related to the CEQA analysis. No changes to the Draft EIR are required in response to this comment.

9.2.4 California Department of Water Resources

[EXT]Dana Reserve Specific Plan (SCH2021060558)

Badyal, Damanvir (Daman)@DWR <Damanvir.Badyal@water.ca.gov>
Mon 7/18/2022 12:52 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hi all,

In accordance with Water Code section 12899, DWR regulates the use of DWR right of way by third parties through the issuance of an encroachment permit. The permit process requires the submission of plan drawings signed and stamped by a registered engineer for review and approval by DWR in accordance with California Code of Regulations, Title 23, Chapter 6 Articles 1 -10. Please visit the DWR website link below for links to the Regulations and the Encroachment Permit application. Please note the Regulations spell out the minimum requirements used by DWR to ensure the safety and integrity of the State Water Project when reviewing proposed drawings. The application has 4 requirements, including evidence of CEQA compliance, that must be submitted before DWR will begin its review. CEQA evidence includes biological and cultural resources surveys, studies, and results of records researches in the CHRIS and NAHC databases. https://water.ca.gov/Work-With-Us/Real-Estate/Encroachment-Permits

In accordance with Business and Professions Code Section 8771, DWR's Encroachment Permit Program requires the permittee to ensure there is a designated individual in responsible charge for the protection of survey control and monument preservation within the area in which construction will be conducted. The designated individual shall be a person legally authorized to practice Land Surveying in the State of California. Here is a link to the DWR monuments. https://dwr.maps.arcgis.com/apps/webappviewer/index.html?id=d139ce32be9e43059b932c21521acfe1

After reviewing the above, if there are any questions, please direct those questions to Delia Grijalva, Senior Right of Way Agent at Delia.Grijalva@water.ca.gov or (916) 621-8646.

DWR-1

Note: This proposed project will cross a DWR pipeline to the East of Hwy 101 which would require and Encroachment Permit. Also, as part of the EP process we will need to also review any impacts to drainage towards the DWR pipeline in the area as a result of the proposed project. It appears this project proposes to divert some flows to the East side of Hwy 101 to a creek that already experiences flooding in the area.

DWR-2

Thanks.

Daman Badyal, P.E.
SWP Right of Way Section (Unit) Manager
Division of Operations and Maintenance
Department of Water Resources
Desk Ph: 916.902.8058
Cell Ph: 916.820.8161

9.2.4.1 Response to Letter from California Department of Water Resources

Comment No.	Response
DWR-1	The comment references Water Code Section 12899 and DWR's responsibilities under California Code of Regulations, Title 23, Chapter 6, Articles 1 through 10. The commenter summarizes the encroachment permit application process and requirements. The comment does not raise any issues related to the CEQA analysis. No changes to the Draft EIR are required in response to this comment.
DWR-2	The comment states that the proposed project will cross a DWR pipeline to the east of Highway 101, which would require an encroachment permit. The commenter states that DWR will need to review any impacts to drainage toward the DWR pipeline as part of the encroachment permit process. The need for an encroachment permit from DWR has been noted in Table 2-12 of the EIR. The only proposed improvements east of US 101 are the off-site water improvements. As described in the EIR in Section 2.5.3.4.4, *Off-Site NCSD Improvements*: > These improvements have not been designed and their precise location is not currently known. However, all water system improvements are expected to occur within existing paved roadways, existing public ROW areas, and/or existing NCSD facilities. Each of these improvements is evaluated at a programmatic level in this EIR. Subsequent environmental review of these improvements, if necessary, would be required as described in Section 2.5.2, *Environmental Review of Subsequent Development Proposals.* Similarly, grading and drainage plans have not been developed for these off-site improvements. A summary of DWR encroachment permit requirements has been added as Section 4.19.2.2.9 of the EIR. No additional changes to the Draft EIR are required in response to this comment.

9.2.5 California Department of Parks and Recreation

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State of California • Natural Resources Agency — Gavin Newsom, *Governor*
DEPARTMENT OF PARKS AND RECREATION — Armando Quintero, *Director*

Oceano Dunes District
340 James Way, Suite 270
Pismo Beach, CA 93449

July 21, 2022

Jennifer Guetschow
San Luis Obispo County Department of Planning and Building
976 Osos St., Roomm 300,
San Luis Obispo, CA 93408

Subject: Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (DRSP)

Dear Ms. Guetschow,

These comments are submitted on behalf of the California Department of Parks and Recreation (State Parks), Oceano Dunes District, regarding the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (DRSP), herein referred to as the Project. State Parks appreciates this opportunity to provide comments regarding the DEIR.

State Parks is concerned that the DEIR does not sufficiently address the potential impacts to sustainable groundwater management of the Santa Maria Groundwater Basin (SMGB) and that continued groundwater pumping at current and/or increased levels will result in additional negative and cumulative impacts to sensitive wetland habitats and wetland dependent species, specifically within State Parks managed lands.

The Oceano Dunes District contains rare and diverse wildlife habitats and species many of which are dependent on an assemblage of wetlands, lagoons, and creeks influenced by the hydrology of the SMGB including lands within Nipomo Mesa Management Area (NMMA). These wetland features are already stressed from reduced groundwater levels resulting from chronic and seasonal groundwater overdraft and periodic drought. Multiple groundwater dependent dune slack wetlands within the Oceano Dunes District have disappeared or receded within recent years including Jack Lake, Lettuce Lake, and Surprise Lake. These and other affected wetlands have historically provided habitat for federally- and State- listed species including California red-legged frog (*Rana draytonii*), La Graciosa thistle (*Cirsium scariosum var. loncholepis*) and marsh sandwort (*Arenaria paludicola*). In addition, continuing the present amount of depletion of NMMA groundwater would likely contribute to further-reduced flows within both Oso Flaco Creek and Arroyo Grande Creek, resulting in additional wetland habitat loss including occupied habitat for federally and State listed tidewater goby (*Eucyclogobius newberryi*), steelhead (*Oncorhynchus mykiss*), California red-legged frog, and marsh sandwort.

DPR-1

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The DEIR states in Section 4.10.5 under HYD Impact 3 concerning groundwater that, "NMMA receives a minimum annual delivery volume of 2,500 AFY from the NSWP [Nipomo Supplemental Water Project]" and that "there is more than sufficient water available to meet or exceed the needs of the project." State Parks is concerned that this is inconsistent with the findings from the Nipomo Mesa Management Area 14th Annual Report – Calendar Year 2021 (Submitted April 2022) which states on Page ES-2 that, "Severe Water Shortage Conditions continue to exist in the NMMA in CY 2021 as indicated by the lowest Key Wells Index on record of 8.7 ft msl" and that only "1,064 AF of imported water were delivered through the NSWP in CY 2021."

Despite the SMGB court adjudication, it is clear from the Key Wells Index that the responses required under Severe Water Shortage Conditions have not been sufficient at reversing the groundwater depletion. State Parks is concerned that in addition to current level of groundwater extraction within the NMMA, lingering impacts from past groundwater extraction is resulting in severe depletion of groundwater supply, not only within the NMMA but also within the neighboring Northern Cities Management Area (NCMA) which directly, negatively impacts adjoining Arroyo Grande Creek and its tributary Los Berros Creek.

Under the Severe Water Shortage Condition that exists in the NMMA, no new demand should be added until this condition is permanently reversed. It is apparent that groundwater conditions are getting worse every year. Even if the Project does not require new groundwater pumping, as the DEIR claims, in order to protect essential wetland resources within the SMGB it is apparent that the NMMA needs to pump less groundwater in the future and instead use any additional NSWP supply to make up for the recurring well-documented shortfall.

DPR-1
(cont'd)

Thank you for the opportunity to submit comments for this DEIR. We look forward to working with San Luis Obispo County Department of Planning and Building and other partners to ensure that the environmental review fulfills the requirements of State and federal law so that essential wetland habitat will not be impacted.

You may follow up with Ben Wagner, Senior Environmental Scientist (Specialist) at ben.wagner@parks.ca.gov, or by phone at (805) 574-4587.

DocuSigned by:
Kevin Pearce
6858CF4A691A464...

Kevin Pearce,
Acting District Superintendent

9.2.5.1 Response to Letter from California Department of Parks and Recreation

Comment No.	Response
DPR-1	The comment states that State Parks is concerned the Draft EIR does not sufficiently address the potential impacts to sustainable groundwater management of the Santa Maria Groundwater Basin and that continued groundwater pumping at current and/or increased levels will result in additional negative and cumulative impacts to sensitive wetland habitats and wetland-dependent species, specifically within State Parks managed lands. Please see Master Response MR-1, Groundwater Water Management and Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.

9.2.6 San Luis Obispo County Air Pollution Control District

SLO COUNTY apcd | Air Pollution Control District San Luis Obispo County

VIA EMAIL ONLY

July 27, 2022

Jennifer Guetschow
County of San Luis Obispo Planning and Building
976 Osos Street, Room 200
San Luis Obispo, CA 93408
jguetschow@co.slo.ca.us

SUBJECT: APCD Comments Regarding the Draft Environmental Impact Report for the Dana Reserve Specific Plan

Dear Jennifer Guetschow:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (DRSP). The APCD submitted comment letters for this project on July 21, 2020, and July 26, 2021. While some of the items outlined in those letters have been addressed in the DEIR, others have not yet been addressed or cannot be addressed until construction plans are finalized. Our comments today are a supplement to our previous comment letters.

The project is a request by Dana Reserve, LLC for the adoption of a Specific Plan, Vesting Master Tentative Tract Map No. 3149, Conditional Use Permit, and Development Agreement to allow for the phased development of a master planned community. The project would allow for the future phased development of residential uses, flex commercial uses, open space, trails, and a public neighborhood park within an approximately 288-acre specific plan area. Future proposed development of individual neighborhoods would require the submittal of additional future tract maps to further subdivide the neighborhoods into individual lots; this EIR is intended to provide CEQA streamlining and tiering benefits for those future developments.

Proposed uses for the project are: 831 single family residences (149.5 acres); 458 multi-family residences (23.5 acres); up to 203,000 sq. ft. of commercial and office space (22.3 acres); open space, parks, and roads (92.7 acres).

On January 26, 2021, the Board of Supervisors authorized a General Plan Amendment (LRP2020-00007) to allow for the processing of the DRSP; to ensure consistency between the DRSP, the County General Plan, and Land Use Ordinance, Title 22 of the County Code; and to change the land use category of the site to allow for the DRSP.

APCD-1

T 805.781.5912 F 805.781.1002 W slocleanair.org 3433 Roberto Court, San Luis Obispo, CA 93401

The DRSP area is within the unincorporated area of San Luis Obispo County, adjacent to the Urban Reserve Line (URL) of the community of Nipomo and within the sphere of influence of the Nipomo Community Services District (NCSD). The project would require annexation to the NCSD to establish new connections to existing NCSD water and wastewater infrastructure and modification of the Nipomo URL to include the DRSP area. Annexation of the specific plan area into NCSD service area would be subject to the review and approval of the San Luis Obispo Local Agency Formation Commission.

The County of San Luis Obispo General Plan identifies the project site as the Cañada Ranch specific plan area, which is subject to preparation and adoption of a specific plan prior to annexation of the site into the Nipomo URL to accommodate development proposals and address pertinent issues. The property is designated as an expansion area under the South County Area Plan (Sections 4.5 and 4.8) as well as the San Luis Obispo County Code (Inland) – Title 22, Land Use Ordinance (Section 22.98.072).

Implementation of the DRSP would provide a guide for future private and public development in conformance with requirements set forth in the California Government Code Sections 65450 through 65457. The DRSP would provide a bridge between the County's General Plan and specific development and subdivision plans of the property.

APCD-1 (cont'd)

The DRSP proposes a preliminary phasing plan and identifies an anticipated buildout schedule for development but acknowledges that development may occur in a different order than anticipated. **To maximize potential reductions of VMT and related criteria pollutant and GHG emissions, APCD recommends that all commercial land use development for the project be completed within the first phase.**

APCD-2

Dana Reserve Specific Plan Draft Environmental Impact Report
Section 4.3 Air Quality

- Table 4.3-6 presents a preliminary evaluation of consistency with existing air quality goals, policies, plans, programs, and standards. The table lists many policies and goals supported by the APCD which would improve jobs/housing balance and reduce air pollution, greenhouse gas (GHG) emissions, and vehicle miles travelled (VMT), and states that the project is "potentially consistent" with most of these. However, the DEIR demonstrates that the project is materially inconsistent with these policies and goals in the following ways:
    - *County General Plan Policy AQ 3.3 to avoid air pollution increases:* The Nipomo Mesa is classified as severity level III for PM_{10} & $PM_{2.5}$ in the San Luis Obispo County 2016-2018 Resource Summary Report. With the proposed mitigation measures, daily operational ROG+NOx and PM will be above APCD thresholds of significance, therefore the project is inconsistent with this policy.
    - *County General Plan Policies AQ 4.1, AQ 4.4 to reduce GHG emissions:* With the proposed mitigation measures, GHGs will be reduced "to the maximum extent feasible" but will still be increased. Project is not proposed to be "no net increase" and does not reduce GHGs and is therefore inconsistent with these policies.

APCD-3

- *Framework for Planning (Inland), Principle 5, Policy 2 to reduce air pollutants, GHGs and VMTs:* With the proposed mitigation measures, the project will increase the generation of air pollutants, GHG and VMT and is therefore inconsistent with this policy.
- *Framework for Planning (Inland), Principle 7 to encourage mixed land uses; 2019 RTP Policy Objectives 5.3, 5.4; and 2019 SCS: Community Planning & Development Standards 2 to support development to reduce VMT, GHG and other air pollutants:* With the proposed mitigation measures, the project will increase VMT per employee and overall VMT and is therefore inconsistent with these principles, objectives, and standards. APCD recommends that the neighborhood commercial overlay be expanded to provide a more appropriate ratio of residential to commercial space so the project can be consistent with this Principle 7.

APCD-3 (cont'd)

The DEIR found the project impacts to be significant and unavoidable but also states that some measures are "potentially consistent" with emission reducing policies and goals (e.g. *Framework for Planning (Inland), Principle 7).* The term "potentially consistent" creates doubt in that if the project is potentially consistent with a goal, it is at the same time potentially inconsistent. **Therefore, the APCD recommends the DEIR remove the terms "potentially consistent" and "potentially inconsistent" and specifically define whether the project is consistent or inconsistent with the various policies.**

- Likewise, the project is inconsistent with the land use planning strategies of the APCD Clean Air Plan in that it will further exasperate the existing jobs-to-housing imbalance in the Nipomo area, leading to increased VMT and decreased transportation mobility. **The DEIR states this inconsistency.**

APCD-4

- Table 4.3-8 presents a summary of VMT impacts with the conclusion that impacts would be significant and unavoidable. The table lists County VMT thresholds, but it is unclear how these thresholds were formulated. (The report text mentions *country* thresholds, but this would appear to be a typo and should be *county* thresholds.) SLOCOG has confirmed that these numbers are not from their RTP/SCS and neither SLOCOG nor APCD are aware of an adopted VMT threshold for SLO County. **APCD recommends additional clarification as to the source or methodology used to determine the VMT thresholds and re-analysis of the impacts.**

APCD-5

- In several places, including the conclusion section for AQ Impact 1 in section 4.3.5 on page 4.3-27 and the Residual Impacts section on page 4.3-28, the DEIR states that impacts would be significant and unavoidable, and because the project would further divide the jobs/housing balance and would increase regional VMT, it would be inconsistent with the APCD Clean Air Plan. It is beneficial to note that it would also be inconsistent with the 2019 RTP/SCS and the SLO County General Plan. **APCD recommends that the commercial portion of the project be expanded to provide a more appropriate ratio of residential to commercial space to bring the project into consistency with these planning documents.**

APCD-6

APCD-7

- Table 4.3-9 on page 4.3-30 presents a summary of construction emissions before mitigation. Daily emissions for ROG+NOx exceed the APCD thresholds, and quarterly emissions exceed APCD Tier 1, but are below Tier 2 thresholds. The technical appendix indicates that the Tier 1 threshold for ROG+NOx will be exceeded for each quarter from Qtr 1 of 2024 through Qtr 4 of 2030. As recommended by APCD, the DEIR proposes mitigation for the Tier 1 exceedance including standard mitigation measures and best-available control technology. Elsewhere in the DEIR, it is acknowledged that the exact development plan for future buildout of the DRSP

APCD-8

area is currently not known. Because of this uncertainty, it is not possible to gauge the accuracy of the construction emissions estimates. **APCD recommends that additional emission estimates be performed for construction periods that exceed the Tier 1 threshold using actual contractor's equipment lists after construction plans are formulated. If the project then exceeds APCD Tier 2 quarterly thresholds, additional mitigation would be called for, possibly including a Construction Activity Management Plan (CAMP) and off-site mitigation.**

APCD-8 (cont'd)

- Table 4.3-12 presents a summary of mitigated operational emissions. Per Table 3-4 of the APCD CEQA Handbook, the project's operational phase ROG+NOx and PM emissions are enough to necessitate "All Feasible" measures be implemented by the project to reduce its air quality impacts. Mitigation measure AQ/mm-3.3 on page 4.3-34 prescribes 30 individual measures to reduce operational emissions. Of the 30 proposed measures, 8 (20, 21, 23-27, 29) propose to "meet or exceed" existing building codes, rules, or regulations. Two others (28, 30) propose mitigation by complying with existing building codes, rules, or regulations. A measure is only mitigation when it requires action above and beyond that which is already required. **To be in line with the implementation of "All Feasible" mitigation measures, APCD recommends that the "comply with" and "meet or exceed" conditions language be replaced with "Exceed by 20%" (or other County Planning recommended specific percentage).**

APCD-9

Dana Reserve Specific Plan Draft Environmental Impact Report
Section 4.8 Greenhouse Gas Emissions

- Several places in section 4.8, including Table 4.8-2, refer to a SLOAPCD GHG threshold of significance. SLOAPCD adopted GHG thresholds in 2012, including residential and commercial thresholds based on a gap analysis to demonstrate consistency with the state's 2020 GHG emission reduction goal from the Global Warming Solutions Act (AB 32) and the 2008 California Air Resources Board's (CARB) Climate Change Scoping Plan. In 2015, the California Supreme Court issued an opinion in the *Center for Biological Diversity vs California Department of Fish and Wildlife* (Newhall Ranch) which determined that AB 32 based thresholds derived from a gap analysis are invalid for projects with a planning horizon beyond 2020. **The APCD does not currently have GHG thresholds of significance that are applicable to this project.**

APCD-10

- The methodology used to calculate the service population threshold in Table 4.8-2 relies on statewide data developed by the California Air Resources Board. In 2018, the Fourth District Court of Appeal in Golden Door Properties, LLC v. County of San Diego invalidated the County of San Diego's use of this metric for analyzing the significance of greenhouse gas emissions. The Court of Appeal found that without additional analysis explaining why statewide data is relevant to projects proposed in the County, a local agency's use of the metric was improper for purposes of complying with CEQA. **APCD does not recommend the use of the threshold identified in Table 4.8-2.** The 2021 APCD Interim GHG Guidance document presents some alternatives to this threshold, including:
    - Consistency with a Qualified Climate Action Plan: (not applicable to San Luis Obispo County at this time).
    - No-net Increase: The Newhall Ranch project demonstrated that this method is feasible and defensible.

APCD-11

  - Meeting Local GHG Targets with Best Management Practices: This method was adopted by the Sacramento Metro Air Quality Management District (SMAQMD) for Sacramento County in 2020.
  - Establishing Thresholds Using Local Emission Sectors and Local GHG Inventories: This method was discussed in a SMAQMD draft document prior to their adoption of their 2020 GHG thresholds and was also effectively used in the 2035 Cal Poly Master Plan, also adopted in 2020.

APCD-11 (cont'd)

- In section 4.8.5, the DEIR finds that the GHG emission impacts will be less than significant with mitigation; however, the method used to determine the threshold of significance is neither based on substantial evidence nor legally defensible. **APCD recommends re-analysis of the GHG impacts using one of the above listed recommended methods to determine significance and identify applicable mitigation as discussed below.**
- Table 4.8-3 presents a consistency analysis with existing GHG reduction goals, policies, plans, programs and standards. As with the air quality policies identified above in Table 4.3-6, Table 4.8-3 lists many policies and goals supported by the APCD which would improve jobs/housing balance and reduce air pollution, greenhouse gas (GHG) emissions, and vehicle miles travelled (VMT), and states that the project is "potentially consistent" with most of these. However, the DEIR demonstrates that the project is materially inconsistent with the following policies and goals:
  - County General Plan: Policies AQ 1.5, AQ 1.6, AQ 4.1, AQ 4.4.
  - Framework for Planning (Inland): Principle 5., Policy 2.; Principle 7.
  - 2019 RTP: Policy Objectives 5.3, 5.4
  - 2019 SCS: Community Planning & Development Standards 2.

APCD-12

- Mitigation measure GHG/mm-1.1 on page 4.8-27 prescribes nine individual measures to reduce operational emissions. Of the proposed measures, five (4, 5, 6, 7, 9) propose mitigation by complying with existing building codes, rules, or regulations. A measure is only mitigation when it requires action above and beyond that which is already required. **APCD recommends that the "complying with existing" conditions language be replaced with "Exceed by 20%" (or other County Planning recommended specific percentage).**

APCD-13

- The DEIR finds that the GHG impacts from off-site improvements (GHG Impact 2) would be less than significant with implementation of mitigation measure AQ/mm-3.1. Mitigation measure AQ/mm-3.1 is designed to reduce emissions of ozone precursors and particulate matter but would have a negligible effect on GHG emissions. **APCD recommends re-analysis of the GHG impacts from off-site improvements using one of the recommended methods to determine significance, and the implementation of appropriate GHG-reducing mitigation. For GHG mitigation guidance, see the 2021 APCD Interim GHG Guidance.**

APCD-14

- The DEIR determines GHG Impact 3 to be significant and unavoidable due to inconsistency with the VMT requirements of the RTP/SCS. It is beneficial to note that it would also be inconsistent with the SLO County General Plan. The impact analysis uses County VMT thresholds, but it is unclear how these thresholds were formulated. SLOCOG has confirmed that these numbers are not from their RTP/SCS and neither SLOCOG nor APCD are aware of an adopted VMT threshold for SLO County. **APCD recommends additional clarification as to the source or methodology used to determine the VMT thresholds and re-analysis of the impacts.**

APCD-15

Dana Reserve Specific Plan Draft Environmental Impact Report
Air Quality & Greenhouse Gas Impact Assessment Technical Appendix

- Comments on CalEEMod:
  - It is unclear why the modeling used a vehicle fleet mix based on the San Joaquin Valley APCD residential fleet mix for year 2030 or 2031 (p. 137, 197, 250, 499, 555, 604). **APCD recommends re-running the emission models using the default fleet mix for San Luis Obispo County.**
  - The mitigated land use calculations do not appear to have taken into account the absence of residential natural gas (p. 186, 187, 244, 245, 297, 298, 339, 340, 341, 386, 387, 388, 427, 428, 429, 448, 449, 472, 473, 492, 493, 544, 545, 597, 598, 646, 647, 667, 668, 691, 692, 710, 711) and therefore estimated operational phase emissions may be overestimated.

APCD-16

Dana Reserve Specific Plan Draft Environmental Impact Report
Energy Impact Assessment Technical Appendix

The Energy Impact Assessment on pages 1 through 3 indicates that PG&E and Central Coast Community Energy (3CE) provide electric service to the site, and that PG&E and Southern California Gas provide natural gas service. Since the County of San Luis Obispo has not opted in to 3CE, they are not available as an electric supplier, and PG&E does not provide gas service in San Luis Obispo County.

APCD-17

Collaborative Mitigation Opportunity

APCD is open to working with County Planning staff and the applicant to identify potential projects to mitigate air quality and GHG impacts from this project that would benefit South County residents. For example, any available funds could be used to purchase electric car share vehicles and fund bike share or micro mobility projects that would reduce VMTs and associated impacts.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-5912.

APCD-18

Sincerely,

Vince Kirkhuff

VINCE KIRKHUFF
Air Quality Specialist

VJK/jjr

cc: Dora Drexler, APCD, ddrexler@co.slo.ca.us
Nick Tompkins, Applicant, nick@nktcommercial.com

9.2.6.1 Response to Letter from San Luis Obispo County Air Pollution Control District

Comment No.	Response
APCD-1	The comment identifies the San Luis Obispo County Air Pollution Control District (SLOAPCD) as a responsible agency under CEQA, identifies previously submitted comment letters on the project since initiation of the environmental review process, and provides a summary of the proposed project. No changes to the Draft EIR are required in response to this comment.
APCD-2	The comment notes that the Dana Reserve Specific Plan will be implemented in phases and recommends that commercial land uses be developed as the initial phase to maximize potential reductions of VMT and related criteria pollutant and GHG emissions. The anticipated buildout schedule for the Specific Plan Area is presented in EIR Section 2.5.3.5.3, *Specific Plan Buildout*, and Table 2-11. As noted in Section 2.5.3.5.2, *Site Preparation Phasing*, and illustrated on Figure 2-24, "The Phase 1 initial site preparation and infrastructure establishment would generally facilitate the commercial and residential development within the Phase 1 area (see Figure 2-24). The Phase 2 initial site preparation and infrastructure establishment would generally facilitate the residential development within the Phase 2 area. The Phase 3 initial site preparation and infrastructure establishment would generally facilitate the neighborhood park and residential development within the Phase 3 area." The construction of backbone infrastructure to serve commercial uses as part of Phase 1 of the project will help ensure the commercial uses are allowed to be developed as early in the project build-out schedule as possible. However, build-out will ultimately depend on market and other forces. Therefore, the project does not inhibit, and in fact prioritizes and facilitates, the potential completion of commercial land use development in Phase 1, but it cannot be confirmed that all commercial development will be completed within the first phase. This comment does not relate to any other technical information in the EIR and no changes are necessary to respond to this comment. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
APCD-3	The comment identifies several policies in Table 4.3-6 (Preliminary Policy Consistency Evaluation) and asserts that the project is inconsistent with these policies. The comment also requests that the use of the terms "potentially consistent" and "potentially inconsistent" be eliminated and that the EIR specifically define whether the project is consistent or inconsistent with the various policies. The project's consistency analysis for plans, policies, regulations and other strategies related to efforts to reduce criteria air pollutant (CAP) emissions, greenhouse gas (GHG) emissions, and vehicle miles traveled (VMT) in Section 4.3.2.4, *Applicable State, Regional, and Local Land Use Plans and Policies Relevant to Air Quality*, and Table 4.3-6 (Preliminary Policy Consistency Evaluation) shows the project would be consistent with some, and potentially conflict with other, elements of applicable air quality, transportation, and land use planning efforts. Ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). COSE Policy AQ 3.3 requires avoidance of a net increase in any criteria air pollutant emission in planning areas certified as Level of Severity II or III for Air Quality by the County Resource Management System. The Nipomo Mesa is identified as Level of Severity III for $PM_{2.5}$ and PM_{10} in the County RMS. Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs. Even with implementation of available mitigation, the project would still result in a net increase in PM; therefore, Sections 4.3, Air Quality, and 4.11, Land Use and Planning, of the Draft EIR have been revised to identify the project as potentially inconsistent with this policy. COSE Policies AQ 4.1 and AQ 4.4 do not require no net increase in GHG emissions, they only require implementation of state standards for the reduction of GHGs and reduction of GHGs from development projects. The project has incorporated all feasible mitigation for the reduction of GHG emissions, consistent with the intent of these policies. Framework for Planning (Inland) Principal 5, Policy 2 does not prohibit any increase in GHGs and VMTs. The policy requires that GHGs and VMTs from development be minimized. The project has incorporated all feasible GHG and VMT reduction measures, consistent with the intent of this policy. Framework for Planning (Inland) Principal 7 encourages mixed land uses. The project includes a range of residential and commercial uses, but its basic underlying purpose is to provide a mix of residential uses, including affordable housing and workforce housing. These uses are also encouraged throughout the County General Plan. Increasing commercial uses would inhibit the project's ability to provide the intended range of housing types, in conflict with other policies of the County's General Plan and is therefore not proposed. The EIR evaluated a potential project alternative that prioritized light industrial and commercial uses (Section 5.4.3, *Alternative 2: La Cañada Ranch Specific Plan*). The analysis determined that Alternative 2 would result in reduced impacts to Air Quality, GHG emissions, population and housing, and transportation. However, the reduction in the proposed number of residential units under Alternative 2 would significantly decrease the number of affordable units and affordability of market rate (workforce) housing. Therefore, the

Comment No.	Response
	EIR concluded that this alternative failed to meet some of the basic project objectives, including providing a mix of housing types, including affordable homes. No further changes to the EIR are required to respond to this comment. It should be noted that perfect conformity with every general plan policy is nether achievable nor required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-1342*). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.
APCD-4	The comment points out that the EIR correctly reflected potential inconsistencies with the APCD Clean Air Plan. The air quality analysis under AQ Impacts 1 and 2 and Table 4.3-7 (Project Consistency with the SLOAPCD's CAP Transportation and Land Use Control Measures) shows the project would conflict with applicable land use planning strategies to narrow the jobs-to-housing imbalance in the Nipomo area. However, the analysis also reflects the project would be consistent with certain transportation control measures such as improvements to the public transit and bicycle networks, particularly with implementation of mitigation measures (e.g., Mitigation Measures AQ/mm-3.3 and Mitigation Measure TR/mm-3.1). On balance, the project was determined to be inconsistent with the 2017 SLOAPCD CAP, and, due to the increase in regional VMT and inconsistency with the jobs-to-housing balance, this impact was considered significant and unavoidable. No changes to the EIR are required to respond to this comment.
APCD-5	The comment requests clarification for the county VMT threshold used in Table 4.3-8 (Project VMT Impact Summary). As noted in Draft EIR Section 4.17.2.2.2, *California Senate Bill 743*, "In October 2020, the County drafted Transportation Impact Analysis Guidelines that focus on VMT; these have yet to be approved." Although not approved, the County's Transportation Impact Analysis Guidelines (October 2020) provide the following thresholds of significance for VMT impacts: Residential Projects: 27.2 VMT per capita; Work Projects: 25.7 VMT per employee; Retail and other projects: no net increase in overall VMT. Refer to TR Impact 3 for additional information regarding the VMT analysis. To clarify the note in Table 4.3-8 has been revised to add "; San Luis Obispo County Transportation Impact Analysis Guidelines, October 2020" after "AMBIENT (2022)".
APCD-6	The comment requests additional language be added to the EIR stating that the project is inconsistent with the 2019 RTP/SCS and County General Plan. These potential inconsistencies are noted in Table 4.2-6 in the Air Quality section of the EIR, and elsewhere in the EIR analysis. The project would also be consistent with a number of elements of the RTP/SCS and the SLO County General Plan, particularly with implementation of Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1. Refer to Response to Comments APCD-3 and APCD-4, above. No changes to the Draft EIR are required in response to this comment.
APCD-7	The comment notes that the project should provide more commercial development (i.e., employment-generating land uses) to limit the impact on the County's existing jobs-housing imbalance and to be more consistent with the 2017 SLOAPCD CAP, RTP/SCS, and the County General Plan. Refer to Response to Comments APCD-3 and APCD-4, above. No changes to the Draft EIR are required in response to this comment.
APCD-8	The comment notes the project's estimated unmitigated construction emissions reported in Table 4.3-9 (Summary of Construction Emissions without Mitigation) and acknowledges the Draft EIR findings for daily and quarterly ROG and NOx emissions in relation to SLOAPCD thresholds including those for Tier 1 and Tier 2. The comment also acknowledges the identification of mitigation for the Tier 1 exceedance including standard mitigation measures and best-available control technology but expresses concern with timing and applicability of such measures due to the potential for the Specific Plan Area to be built out under a different scenario than that analyzed in the Draft EIR. The SLOAPCD recommends additional mitigation to address this uncertainty; therefore, Mitigation Measure AQ/mm-3.1 has been revised as follows: A Construction Activity Management Plan (CAMP) shall be prepared. The CAMP shall be submitted to SLOAPCD for review and approval at least three months before the start of construction. The CAMP shall include a dust-control management plan, tabulation of on and off-road construction equipment (age, horse-power, and usage rates), construction truck trip schedules, construction work-day period, and construction phasing. Each subsequent developer shall provide documentation establishing consistency with the CAMP prior to the start of construction activities. If there are any changes to these assumptions after completion of the CAMP, the subsequent developer shall coordinate with SLOAPCD to ensure alterations are not detrimental to emissions reduction strategies and that revisions to the CAMP are not required. If implementation of Standard Mitigation and Best Available Control Technology measures cannot reduce project emissions to below SLOAPCD's Tier 2 threshold, off-site mitigation shall be implemented in coordination with SLOAPCD to reduce NOX and ROG emissions to below the Tier 2 threshold. At a minimum, the following measures shall be implemented and included in the CAMP to reduce construction generated mobile-source and evaporative emissions:"…

Comment No.	Response
	No further changes to the Draft EIR are required in response to this comment.
APCD-9	The comment recommends mitigation required to exceed applicable building standards and code requirements, rather than just meeting or complying with standards. The SLOAPCD recommends requirements that the project exceed applicable building code standards, as simply complying with existing standards is not mitigation in the sense that it does not require anything more than is already required to be complied with. In this case, compliance with existing building codes and other rules and regulations was listed in Mitigation Measure AQ/mm-3.3 to ensure this could be tracked and verified through the MMRP, as compliance with these standards was assumed and included in the Air Quality modeling completed for the project. No exceedance of these standards is required or necessary to be consistent with the EIR analysis, and an exceedance of what are already very stringent building code requirements could add substantial cost to the project. This approach is consistent with past guidance from the APCD. Additional mitigation measures (e.g., GHG/mm-1.1(5), (6), and (7)) were also included in the MMRP to ensure consistency with measures that were included in the emissions modeling to reflect current building code requirements. No further changes to the Draft EIR are required in response to this comment.
APCD-10	The comment notes references to a SLOAPCD GHG threshold in the project's GHG emissions analysis in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, including Table 4.8-2 (SLOAPCD GHG Thresholds of Significance). The comment further states that based on recent CEQA case law, e.g., the 2015 Newhall Ranch decision, projects with a development horizon beyond 2020 such as this project, cannot use the SLOAPCD's 2012 GHG threshold of significance. The analysis of GHG emissions in Draft EIR Section 4.8, Greenhouse Gas Emissions, was not conducted using the SLOAPCD's previously recommended GHG threshold. The Draft EIR has been corrected to read: "~~SLOAPCD~~ GHG threshold" where applicable. In addition, refer to Response to Comment APCD-11. No further changes to the Draft EIR are required in response to this comment.
APCD-11	The comment questions the method used to determine the threshold of significance based on the recent case law in *Golden Door Properties, LLC v. County of San Diego/Sierra Club, LLC v. County of San Diego, Cal. App. 5th (2018)* and recommends use of one of four other identified methodologies, including establishing thresholds using local emission sectors and local GHG inventories. The GHG significance threshold has been updated using County-specific data and growth forecasts. The Air Quality & Greenhouse Gas Impact Assessment prepared for the project (Appendix D of the Draft EIR) has been revised to reflect the County-specific data and text related to methodology has been revised as follows: > The efficiency threshold used for this analysis is based on SB 32 GHG emission reduction targets, which take into consideration the emission reduction strategies outlined in ARB's 2017 Scoping Plan. The efficiency threshold was calculated based on County of San Luis Obispo GHG emissions inventory identified in the 2011 EnergyWise Plan for the unincorporated areas of the County. The County's GHG inventory identifies major emission sectors, including agricultural, transportation, and non-transportation sectors, and associated GHG emissions (refer to Table 16). Emissions sectors that did not apply to the proposed project (i.e., agriculture & aircraft) were excluded from the threshold calculation. Population and employment projections were derived from the San Luis Obispo Council of Governments (SLOCOG) 2050 Regional Growth Forecast. For consistency with the State's 2020 GHG-reduction target, as outlined in AB 32, the County set an emissions reduction target of 15 percent below baseline year 2006 levels by 2020. The County adopted this emissions reduction target and the baseline emissions in inventory in 2010 as part of the Conservation and Open Space Element of the County's General Plan. This same baseline year GHG inventory was used for calculation of the projected future year 2030 GHG reductions required to achieve the State's GHG reduction target of 40 percent below baseline year 2006 emissions. > The GHG emissions inventory for the land use sectors applicable to the proposed project (refer to Table 16) were divided by the projected SP for future year 2030 (allowable emissions) to derive a GHG efficiency threshold of 2.9 MTCO2e/SP/year. The report in Appendix D (AMBIENT 2022) has been replaced with the revised Air Quality & Greenhouse Gas Impact Assessment (AMBIENT 2023) and Section 4.8 of the EIR, Greenhouse Gas Emissions, has been updated to reflect the revisions in the updated Air Quality & Greenhouse Impact Assessment. The localized analysis resulted in a slightly lower GHG efficiency significance threshold (2.9 $MTCO_2e$/year compared to the Draft EIR's 3.4 $MTCO_2e$/year); however, no changes to the impact determinations or mitigation requirements in the Draft EIR were necessary. No other changes to the EIR are necessary.
APCD-12	The comment references the project's consistency analysis for plans, policies, regulations and other strategies related to efforts to reduce GHG emissions and VMT in Draft EIR Section 4.8, Greenhouse Gas Emissions, including Table 4.8-3 (Consistency Analysis for Greenhouse Gas Emissions) in Section 4.8.2.4, *Applicable State, Regional, and Local Land Use Plans and Policies Relevant to Greenhouse Gas Emissions*. As shown, the project would be consistent with some, and conflict with other, elements of applicable planning efforts.

Comment No.	Response
	General Plan Policies AQ 1.5 and 1.6 require projects to reduce vehicle travel demand and expand opportunities for multi-modal travel. Although the project would increase VMT, the project would include the development of an interconnected system of pedestrian and bicycle facilities, a Park and Ride transit center, transit stops along Collector A, and other mitigation requirements to reduce VMT, consistent with the intent of these policies. SLOCOG 2019 RTP Policies 5.3 and 5.4 encourage land planning that reduces GHGs and balances housing and jobs. Although the project would result in significant effects related to VMT and population and housing, it provides a mix of land uses in an area of planned growth, incorporates all feasible measures for reducing GHG emissions, and encourages alternative forms of transportation, consistent with the intent of these policies. SLOCOG SCS Community Planning and Development Standard 2 encourages development of land use types near urban downtowns and villages to support mixed-use, infill, and residential development. The project has incorporated many of the recommended actions in this policy in an area of planned growth proximate to downtown Nipomo, including increased bicycle parking requirements, intensification of land uses, modification of setbacks, provision of a mix of uses, and provision of residential uses. The project is also within the NCSD's Sphere of Influence, consistent with the intent of this policy. Refer also to response to Comments APCD-3 and APCD-4, above. No changes to the Draft EIR are required in response to this comment. See also Chapter 10, Supplemental Analysis of the 2023 DRSP, which included proposed project revisions that would further reduce environmental impacts related to GHGs and VMT and improve project consistency with applicable policies.
APCD-13	Refer to Response to Comment APCD-9, above.
APCD-14	Mitigation Measure AQ/mm-3.1 would include measures to reduce emissions from diesel-fueled construction equipment, which are a significant source of black carbon, which is a short-lived climate pollutant. Construction-generated GHG emissions were amortized and included with operational emissions for comparison to the GHG significance threshold. In addition, refer to Response to Comment APCD-8, above.
APCD-15	Refer to Responses to Comment APCD-3, APCD-4, APCD-5, APCD-6, and APCD-11, above.
APCD-16	The comment references the project's CalEEMod data and requests an update that uses a vehicle fleet mix for San Luis Obispo County rather than San Joaquin Valley County Air Pollution Control District (SJVAPCD) as currently shown. The emissions modeling in the updated Air Quality & Greenhouse Gas Impact Assessment (AMBIENT 2023) was revised using the CalEEMod vehicle fleet mix for San Luis Obispo County. Text and tables in Draft EIR Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, have been updated accordingly, but did not affect impact conclusions or mitigation measures. No additional changes to the Draft EIR are required in response to this comment.
APCD-17	Section 4.6 of the EIR, Energy, has been revised to clarify that the County has not opted into 3CE and natural gas would be provided by SoCalGas. No further changes to the EIR are required in response to this comment. However, it should be noted that, partially in response to the recent Ninth Circuit Court decision in *California Restaurant Association v. City of Berkely (9th Cir., No. 21-16278, April 17, 2023)*, Mitigation Measure GHG/mm-1.1 has been revised to provide an alternative approach to mitigating GHG emissions associated with natural gas service. Per revised GHG/mm-1.1, compliance with this mitigation measure can be achieved by either (1) prohibiting natural gas service to residential development; or (2) constructing residential electrical systems with sufficient capacity and pre-wiring to accommodate future retrofit to all-electric, and preparation of a GHG-reduction plan identifying additional on-site or off-site GHG-reduction measures to be implemented sufficient to fully offset GHG emissions associated with natural gas service to residential uses. This approach is consistent with how SLOAPCD and other air districts in the state are addressing this issue.
APCD-18	The comment offers APCD collaboration with the County to identify potential projects to mitigate air quality and GHG impacts from this project that would benefit South County residents. The comment does not relate to any specific information or the findings in the EIR; therefore, no revisions to the Draft EIR are required in response to this comment. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.2.7 Coastal San Luis Resource Conservation District

Coastal San Luis Resource Conservation District
1203 Main Street, Suite B, Morro Bay, CA 93442
805-772-4391 | www.coastalrcd.org

July 31, 2022

Ms. Jennifer Guetschow, Project Manager
County of San Luis Obispo
Department of Planning and Building
San Luis Obispo, CA 93401

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

The Coastal San Luis Resource Conservation District (CSLRCD) is a special district in San Luis Obispo County that provides information, support, and technical and engineering services to landowners and government agencies in the southwestern portion of San Luis Obispo County. We appreciate the opportunity to comment upon the Draft Environmental Impact Report (DEIR) on the Dana Reserve Specific Plan and project in Nipomo.

We will leave to others comments on the technical details of the project and its impacts as discussed in the DEIR. We are primarily concerned with two areas of impact of the project: these are the impacts upon the oak woodlands of the project site, and on the water supply. Our review leads us to suggest that a smaller project at that site could still accomplish many of its goals while conserving most of the site and its valuable habitats.

Loss of Oak Woodland and Associated Habitat is Excessive. County policies call for protection of the oak woodlands of the Nipomo area, yet this project proposes to destroy some 4,000 oak trees and associated habitat, including a rare local vegetation type known as Burton Mesa chaparral, in order to develop several hundred tract lots on the project site. We find such a vast gap between existing County policies and what is proposed to be very disappointing. While some losses may be unavoidable, it would appear that they could be much reduced and possible to mitigate for on-site with a project with a smaller footprint. **RCD-1**

Having worked for years on habitat enhancement and restoration in the Oceano Dunes area, CSLRCD has first-hand knowledge of the challenges inherent in such efforts, especially as the scale of those efforts grows. In the case of Dana Reserve, the losses of the oak woodland and the so-called Burton Mesa chaparral would be extremely difficult to mitigate: such mitigation would require locating, purchasing, and successfully establishing an entirely new ecosystem somewhere on the Nipomo Mesa, presumably using propagules from the project site of at least nearby. We believe this to be unrealistic; a more reasonable and logical approach would be to preserve as much of the oak woodland and **RCD-2**

associated habitat as possible on-site, and utilize other portions of the property for mitigation, which would be at a much smaller scale.

RCD-2

Water Issues. The DEIR appears to say that water is not really an issue for the project, as the Nipomo Community Services District (NCSD) would be the purveyor of water to the site, and it can purchase water from a supply in the Santa Maria area. The DEIR goes on to argue that the discharge from the local water treatment facility would help to recharge the local groundwater basin, so that there is no net loss of water to the basin as a result of the project. We are uncertain of this, and suggest further evaluation of this claim. This is because some years ago, CSLRCD was asked to look into a situation where a property owner along Nipomo Creek east of Highway 1 was seeking permission to draw water from the creek for use on his crops. A site visit showed that the creek had significant flow, which suggested strongly that water from the treatment facility (which was across the highway from the property in question) was percolating into the soil, hitting an impermeable or poorly permeable subsoil, and running eastward atop that layer but still underground, and surfacing in Nipomo Creek.

The Nipomo groundwater basin has been declining for years, and is considered to be in serious overdraft. We believe that further evaluation of the ultimate fate of water imported for the project is prudent and in the best interests of the Nipomo community.

RCD-3

Recommendations. It is recommended that the DEIR further evaluate the alternatives to the project to more carefully determine whether a smaller project can meet the goals stated therein while conserving the majority of the site.

RCD-4

Thank you for the opportunity to comment on the DEIR for this project.

Jackie Crabb

Jackie Crabb, Executive Director
Coastal San Luis Resource Conservation District
1203 Main St., Ste. B
Morro Bay, CA 93442

9.2.7.1 Response to Letter from Coastal San Luis Resource Conservation District

Comment No.	Response
RCD-1	Please see Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.
RCD-2	The comment states that the losses of oak woodland and Burton Mesa chaparral would be difficult to mitigate and would require locating, purchasing, and successfully establishing an entirely new ecosystem somewhere on the Nipomo Mesa and suggests a more reasonable and logical approach would be to preserve as much of the oak woodland and associated habitat on-site and utilize other portions of the property for mitigation, which would be at a much smaller scale. Please see Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, in Section 9.1, above. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
RCD-3	The comment questions the claim in the Draft EIR that the discharge from the local water treatment facility would help recharge the local groundwater basin based on an observation that water from the treatment facility was percolating into the soil, hitting an impermeable or poorly permeable subsoil, and running eastward atop that layer but still underground, and surfacing in Nipomo Creek. Please see Master Response MR-1, Groundwater Water Management and Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.
RCD-4	The comment recommends further evaluation of alternatives to the project to more carefully determine whether a smaller project can meet the goals while conserving the majority of the site. Please see Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.

9.2.8 California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

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August 1, 2022

SLO US101 PM 6.24
SCH# 2021060558

Jennifer Guetschow
Planning & Building Department
County of San Luis Obispo
976 Osos Street, RM 200
San Luis Obispo, CA 93408

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE DANA RESERVE SPECIFIC PLAN

Dear Ms. Guetschow:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the Dana Reserve Specific Plan. The proposed project includes: 1,289 Residential units (831 single family residential units and 458 multi-family residential units), up to 203,000 sq ft of commercial (including a hotel, educational/training facilities, and retail/light industrial uses), open space, parks, and trails. Caltrans offers the following comments at this time.

General comments:

Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Management (TDM) Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.

We support the project's goal of providing much needed housing in the region and for dedicating land for affordable housing while incorporating TDM strategies into the site plan. These strategies will help reduce Vehicle Miles Travelled (VMT) and auto dependency. These goals and strategies are consistent with the Caltrans *Strategic Management Plan 2020-2024* and State planning priorities.

Caltrans-1

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Traffic Operations:

Caltrans concurs that the project should contribute its fair share into the South County Traffic Impact Fee program to support future infrastructure improvements, in particular improvements at the US 101 & Willow Road intersection. Caltrans staff is engaging in discussions with the County and the applicant team on future improvements at the US 101 & Willow Road intersection, which will be determined by the outcome of an intersection control evaluation (ICE) and accompanying safety analysis. Future improvement at this location could include a signal or functional equivalent, ramp metering, or other intersection modifications.

As Caltrans and other agencies move away from prioritizing capacity expansion to reducing VMT and optimizing multimodal connectivity, we support and encourage local road network improvements that align with these goals and complement overall travel efficiency with the State Highway System. Additionally, we support local and parallel route development for access management purposes.

Caltrans supports the project's proposal to further the completion of the frontage road connection between West Tefft Street to Willow Road. Construction of this parallel route along US 101 will aid in relieving congestion on the surrounding roads and US 101. This aspect of the project will help in decreasing congestion, VMT, and improve connectivity in the area.

Caltrans-2

Transit:

We support the inclusion of two new transit stops and the Park and Ride within the footprint of the project. These features are in line with State planning priorities to increase alternative modes of transportation, reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT). We recommend installation of electric vehicle (EV) charging stations at the proposed Park and Ride and throughout the project wherever feasible. EV charging stations can help to reduce GHG emissions by providing a sustainable transportation option through electric vehicles.

Caltrans-3

The proposed transit stops will provide a multimodal connection to and within the south county region helping to reduce VMT. Providing service to the new stops requires close coordination with the San Luis Obispo Regional Transit Authority (SLORTA). To determine how these stops would be incorporated into the existing transit system, we strongly recommend proactively engaging with SLORTA.

Caltrans-4

Hydraulics:

We look forward to receiving and reviewing the final drainage report. It should compare 100-year pre-development runoff with post-development conditions showing no increase in flows reaching Caltrans drainage facilities.

Caltrans-5

Permits:

Please be aware that any future work completed in the State's right-of-way will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: https://dot.ca.gov/caltrans-near-me/district-5/district-5-programs/d5-encroachment-permits. **Caltrans-6**

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6432 or Jenna.Schudson@dot.ca.gov

Sincerely,

Jenna Schudson

Jenna Schudson
Development Review Coordinator
District 5, LD-IGR South Branch

9.2.8.1 Response to Letter from California Department of Transportation

Comment No.	Response
Caltrans-1	The comment expresses Caltrans' general support of local planning projects that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety, including support for the housing, including affordable housing, component of the DRSP and the TDM strategies incorporated into the site plan as important elements in reducing vehicle miles traveled. This comment does not raise any issues related to the adequacy of the CEQA analysis. No changes to the Draft EIR are required in response to this comment.
Caltrans-2	The comment states Caltrans' concurrence with requiring project contribution to the South County Traffic Impact Fee program to support future infrastructure improvements, in particular improvements at the US 101 and Willow Road intersection and Caltrans' support for the completion of the frontage road connection between West Tefft Street and Willow Road as an improvement that will aid in relieving congestion on the surrounding roads and the US 101, reducing congestion/VMT, and improving connectivity in the area. The project would be required to pay its fair share contribution to the South County Traffic Impact Fees program and all transportation development impact fees shall be applied to the project in accordance with the County's standard practices. These requirements are consistent with the recommendations of this comment.
Caltrans-3	The comment notes Caltrans' support of the inclusion of two new transit stops and the Park and Ride within the DRSP footprint as consistent with State planning priorities and recommends the siting of electrical vehicle (EV) charging stations at the proposed Park and Ride and throughout the project wherever feasible to further reduce GHG emissions. Mitigation required in the EIR would help facilitate EV charging throughout the project site through, for example, through requirements that commercial land uses require 15% of fleet vehicles to be zero-emission, dedicated parking for high-efficiency vehicles, and exceedance of building standard requirements for EV charging infrastructure (refer to Mitigation Measure AQ/mm-3.3). In addition, a reference to EV charging stations has been added to Mitigation Measure AQ-3.3(7) and AQ-3.3(12). No additional changes to the Draft EIR are required in response to this comment.
Caltrans-4	The comment notes Caltrans' support of the inclusion of two new transit stops within the DRSP footprint to create a multimodal connection to and within the south county region helping to reduce VMT and recommends coordination with the San Luis Obispo Regional Transit Authority (SLORTA) to provide service to the new stops. The comment does not raise any issues related to the adequacy of the CEQA analysis. No changes to the Draft EIR are required in response to this comment.
Caltrans-5	The comment notes Caltrans' expectation of a final drainage report that would compare 100-year pre-development runoff with post-development conditions to verify no increase in flows reaching Caltrans drainage facilities. A final drainage report would be required at the time of subdivision improvements plan submittal. In addition, the conditions of approval for the project include the following: Submit complete drainage calculations prepared by a licensed civil engineer to the Department of Public Works for review and approval. If calculations so indicate, drainage must be retained/detained in a drainage basin on the property [21.03.010(5)(b)]. Calculations shall demonstrate that 100-year post-development flows do not exceed 100-year pre-development flows at each Caltrans culvert. The design of the basin is to be approved by the Department of Public Works, in accordance with county standards. The basin/s is/are to be maintained in perpetuity. No changes to the Draft EIR are required in response to this comment.
Caltrans-6	The comment references Caltrans' encroachment permit process for work that would occur with the Caltrans right-of-way. The comment does not raise any issues related to the adequacy of the CEQA analysis. No changes to the Draft EIR are required in response to this comment.

9.2.9 County of San Luis Obispo Parks and Recreation Department

COUNTY OF SAN LUIS OBISPO
PARKSAND RECREATION DEPARTMENT

August 1, 2022

County of San Luis Obispo
Department of Planning and Building
Attn: Jennifer , Planner Via-email: jguetschow@co.slo.ca.us

RE: Dana Reserve Specific Plan Amendments Draft Environmental Impact Report

Hello Jennifer,

Thank you for the opportunity to comment of the Dana Reserve Specific Plan Amendments Draft Environmental Impact Report. I started with some general clarifications and questions that thred through the whole document and finish with specific comments on specific item within the documents. Blue text is suggested language.

Please clarify that the applicant does not proposed development of the neighborhood park. They propose to offer to dedicate undeveloped land for the neighborhood park for the County to development. The development will cost the 10s of millions of dollars and will take 20 to 50 years if at all. Based on the project description, analysis of policy consistency and impacts in the public Service and Recreation sections appears to assume the neighborhood park will be developed at the time the proposed residences are. **SLOPRD-1**

Please explain what a Quimby Fee is what its used for and that the applicant is asking for Quimby Fee Credit for the undeveloped land proposed as a future neighborhood park. **SLOPRD-2**

Please clarify the size of the neighborhood park site proposed is to be dedicated to the County for future development of a neighborhood park. it is referred to as 8, 10 and 11 acres throughout the DEIR. **SLOPRD-3**

Please clarify the net size of the proposed neighborhood park minus drainageways and drainage basins. **SLOPRD-4**
Does the applicant propose to develop the proposed equestrian staging? **SLOPRD-5**

Project Description Page ES-3 and all throughout the document "public neighborhood park" remove the word "Public" as the County Parks has not agreed to accept this park on behalf of the public or reword as open to public neighborhood park. The term public park may lead readers to believe it is a park operated and maintained by the County Parks. County Parks and Recreation Department does not have the funding to develop or maintain this park. **SLOPRD-6**

PS Impact 4:-The project **will** result in an increased demand on public park facilities. Is Implementation of Mitigation Measure PS/mm-1.1 sufficient. **SLOPRD-7**

REC Impact 1- The project could increase the use of existing neighborhood, community, or regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. Why no mitigation necessary?? **SLOPRD-8**

Alternatives - Please provide an alternative that doesn't impact recreation facilities **SLOPRD-9**

ES-66 doesn't bring up the Public Park discussion. **SLOPRD-10**

Page 2-15 - The common area lots would be privately owned and maintained by an HOA or similar entity(ies) but would be accessible and available to the general public. The exception is the neighborhood park, which the applicant proposes to dedicate undeveloped land to be developed and maintained by the County". County Parks does not want to the add this Park into its inventory because of its location, size and lack of maintenance support. The proposed neighborhood park is less than one mile from Nipomo Community Park. This will locate two parks within a one-mile area of Nipomo. Leaving the other 14 miles that make up the community Nipomo without any parks close by. The applicant proposes only to offer the land for the neighborhood park leaving the County to fund construction, permitting, and maintenance of the proposed park. Finally, the applicant is asking for a waiver of 50% of the Quimby Funds. A Quimby Fee is a development fee paid to County at the creation of new residential lots to fund recreational facilities to off-set the increased use of existing recreation facilities by the new residents. Quimby fees are used to develop new parks and recreation amenities to accommodate the additional population brought to the community by development of residences. The applicant is requesting the County take undeveloped land in an undesirable location, that is subpar in size instead of paying Quimby Fees which could fund needed recreation amenities in Nipomo Community Park, which is less than a 1/4 mile away. Recent community surveys indicate there is a great need for active recreation features in the community of Nipomo. Quimby Funds generated from this project could add these recreation amenities. **SLOPRD-11**

Page 2-31-If County Parks is required to accept the neighborhood park parcel it should be free from the limitations outlined on this page. The applicant is not proposing to develop the park and it should be developed with the recreational elements needed by the community at the time. Considering uncertainty of funding for development/maintenance of the park it is likely 20 to 50 years until development if at all.

The recreational needs of Nipomo in 50 years from now is unknown. County Parks does not support the limited elements called out in this specific plan. I suggest this section be deleted or remove the word would and replace the word would with could in the following sentence. "Figure 2-11 provides a conceptual design of the park and the DRSP provides the following list of amenities that could be considered in final park design:". **SLOPRD-12**

Page 2-51 Phasing - The phasing plan proposed to provide the land for the neighborhood park in the 3rd phase of development. After 2/3 of the residents are built and occupied. These residents will be using existing recreational features in the community and nearby Nipomo Community Park. The applicant is requesting a Quimby credit be granted for units developed in all phases for exchange for the undeveloped neighborhood park to be provided in phase 3. This means the more than 5,000 new residents will be using the existing recreation features, without paying the full Quimby Fees needed to fund new recreational features to accommodate this population growth. Considering that uncertainty of when the County can develop the neighborhood park creates decades of recreation deficiency for the residents of this Nipomo. **SLOPRD-13**

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4.11.21 Goal 7. Practice financial stewardship - Is allowing the applicant pay less Quimby Fees for providing land for an undeveloped neighborhood park that the County does not want that will cost the County 10s of millions of dollars to develop and more money to maintain practicing financial stewardship? Is allowing residents of Nipomo to be deficient of recreational funds (Quimby Fees) and subsequent recreational amenities developed from Quimby Fees for decades until the County can develop the proposed neighborhood park practicing financial stewardship? **SLOPRD-14**

4.15.7 EXISTING COMMUNITY PARKLAND LEVEL OF SEVERITY – Please mention that this measurement only measures park land and does not measure park land developed with recreational features. That even through Nipomo Community Park is 136 acres 100 acres are natural area and only 35 acres are development with recreation amenities. **SLOPRD-15**

4.15.9 THE QUIMBY ACT – The applicant proposes to dedication raw land for future use of a public park in lieu of having to pay 50% of Quimby fees. The County finds accepting this offer is inconsistent with the policies of the Park and Recreation Element and not to the recreational benefit of the residents of Nipomo. The purpose of the Quimby Act should be defined so the readers understand what is being proposed. **SLOPRD-16**

4.15.10 Parks and Recreation Element – Please include that the Park and Recreation Element includes policies regarding land acquisition, development and maintenance that are especially relevant to the application proposal to offer land in lieu of Quimby Fees. **SLOPRD-17**

4.15.12 Policy 2.1- Provide parks which are aesthetic and consistent with community needs.- Please be clear that the "10 acre park site" will not be developed as a park. It is a dedication of land. The project does not propose to develop neighborhood park so this site will not provide a recreational benefit for 20 to 50 years if at all. It will cost the County 10 's of millions of dollars to develop this park site and more to maintain. In the meantime, this project will add more than 4500 people to the existing recreational facilities in Nipomo. This is not consistent with the community's needs.

The applicant proposes providing this undeveloped neighborhood park site in lieu of paying Quimby Fees. Quimby Fees are used to develop recreational amenities as additional residents move to the area because of the additional proposed residences. The applicant's proposal of dedicating undeveloped land instead of paying Quimby fees creates a 20-to-50-year lag time in providing needed recreation amenities the community to offset the impact of the proposed 4554 new residents. This is not consistent with community needs. **SLOPRD-18**

4.15.12Policy 2.2- Please explain how dedication of undeveloped land "serves a good mix of users from within the Dana Reserve"?

Please add the text in blue "However, County Parks has stated that a waiver of Quimby Fees would" delay development of recreational amenities needed in Nipomo while increasing the number of people using existing recreational amenities. The Specific Plan will add 4554 people to the area without benefit of Quimby fees that are meant to expand recreational uses as residents are added to a community. The proposed dedicated of land for an undeveloped neighborhood park land will not provide recreation to residents of the Specific Plan or Nipomo until it is developed as a park. If the County accepted the **SLOPRD-19**

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neighborhood park site, it would cost the County tens of millions of dollars to develop it into a park and it would likely take 20 to 50 years to fund development of this park.

Please add the text in blue "County Parks has commented that the neighborhood park would not serve an important existing or future need because the proposed park site is offered as undeveloped land that:

- Does not augment needed recreation opportunities. To develop a park on the neighborhood park site would cost the County 10's of millions of dollars and more money to maintain. The applicant does not propose to fund development of the neighborhood park with recreational amenities or maintain this park.
- The cost of development does not allow for development in a reasonable time period.
- Does not accommodate planned uses. A neighborhood park less than a quarter mile from Nipomo Community Park is not a good use sparce resources.
- Does not provide a long-term maintenance instrument.
- The net size of the park if drainage features and daycare site is removed appears to be less than 8 acres. This is smaller than the more than 10 acres needed to qualify for acquisition of a park site. The site is devoid of any special features that make acceptance of this sub-par sized site beneficial to the community.
- The location is less than a mile from Nipomo Community Park which does not allow for equitable distribution of parkland within the community of Nipomo creating two parks within a one-mile area and no parks in other 14 miles of the community of Nipomo.

SLOPRD-19 (cont'd)

4.15.13 Policy 2.4 - Please be clear that this project does not propose to develop the neighborhood park site. The project offers of dedication of undeveloped land that has little to no recreational components or recreational opportunities. This site will not provide a recreational benefit for 20 to 50 years if at all because it would cost the County 10 's of millions of dollars to develop and more to maintain. This project is inconsistent with this policy because it provides little to no recreational components.

SLOPRD-20

4.15.13 Policy 2.5 – The County accepting an offer of an undeveloped subpar sized lot for future development of a neighborhood park site that is located less than a mile from Nipomo Community Park that would cost the County 10s of millions of dollars to develop and more money to maintain does not encourage private development of parklands and facilities, to assist with meeting park needs.

SLOPRD-21

Page 4.16.8, Goal 1 - Please include that the public park is undeveloped? Will the applicant develop the Equestrian trailhead area?

Page 4.16.8 Objective A discussion – Please clarify that the applicant does not propose to develop the neighborhood park but instead proposed to offer the site for future development by the County. Will the applicant develop the Equestrian staging area?

Page 4.16.8, Policy 2.1- Potentially Inconsistent. Please be clear that the applicant is not developing the neighborhood park, they are dedicating undeveloped land that will cost the County 10 's of millions of dollars to develop into a park and more to maintain. This park site will not provide a recreational benefit to the community for 20 to 50 years. As proposed the park site won't be offered to the County

SLOPRD-22

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until the final phase of the development. Per built out plans this Specific Plan will be built out by 2030. Adding 4500 additional people using existing recreation amenities for the 20 to 50 years until the County can fund the development of the new park is not consistent with the community's needs.

SLOPRD-22 (cont'd)

Quimby Fees are used to create new and improved recreation features to offset the increased demand for recreation amenities created by the new residents. The applicant is requesting a waiver of the Quimby Fees because they are providing the undeveloped neighborhood park site. Quimby Fees are used by the County to develop new recreational features needed to accommodate new residents. Waiving Quimby Fees for this park site is not consistent with the community's needs.

SLOPRD-23

The neighborhood park site is poorly located to serve the community of Nipomo. It is less than a mile from Nipomo Community Park. If this park site is accepted that would locate two parks in less than a mile from eachother in a community that is 15 miles in size. Leaving most of the Nipomo without a park nearby. This is not consistent with the community's needs.

SLOPRD-24

The park land discussion in the second paragraph is not relevant to the goal. The applicant does not propose to build the park so it isn't parkland until the County can provide park amenities to the site.

SLOPRD-25

Page 4.16.9, Policy 2.2, Determination 1-"of a new public park and smaller neighborhood parks within". It is confusing. Elsewhere in the document the parks are referred to as "new public neighborhood park and smaller pocket parks".
Determination 2 - Please mention that this project will offer undeveloped land for the neighborhood park. The County would need to development the park. The date this park could be developed in unknown but likely well be after build out of the proposed project.

SLOPRD-26

Determination 4- The applicant is not developing the neighborhood park. This proposal leaves that to the County at a cost of 10s of millions of dollars. This development will take 20 to 50 years to find funding for and complete construction. Based on the Specific Plan's build out time of 7 years leaves 15 to 43 years after Specific Plan buildout that this neighborhood park site will provide a recreational benefit to the community. This is not a reasonable development timeline. Especially if you consider the proposed project adds 4500 additional people using existing recreation amenities for the 20 to 50 years.

SLOPRD-27

Determination 5- This site does not serve an important existing or future need. The County's 2016–2018 Resources Summary Report concludes there is adequate regional and community parkland within the community of Nipomo. What residents of Nipomo need are park amenities and funds to build these amenities. The dedication of land for the neighborhood park is in-lieu of paying Quimby Fees, funds used to develop the recreation amenities needed in Nipomo. Nipomo is 15 miles in size. The location of the dedicated neighborhood park site is less than a mile from Nipomo Community Park. That would mean two parks are within a mile of each other and zero parks in the other 14 miles of the community.

SLOPRD-28

Determination 6 please add text in blue "stormwater basins and drainage ways .
The rest of that paragraph about the "park amenities have been designed to….." doesn't seem to match the policy topic. There are no proposed designs for this neighborhood park. The applicant does not propose to develop it.

SLOPRD-29

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The proposed neighborhood parks site does not accommodate planned uses in terms of size and location. The Specific Plan encumbers the uses allow on this park site even though it is offered to the County. The neighborhood park site is encumbered by drainage ways and basins that serve the development not the future park. These encumbrances make the neighborhood parks site smaller than what is defined in the Parks and Recreation Element as land for future park development by the County. The location is encumbered because it is too close to Nipomo Community Park leaving the majority of Nipomo without a nearby park. **SLOPRD-30**

Determination 8 - This goal is about acquisition. The trails and pocket parks are not part of this discussion because the HOA will mange these. The neighborhood park site is encumbered with drainage features that make this site too small to be consistent with this goal and it does not have any outstanding characteristic or unique features that would justify accepting the neighborhood park site into the County Parks system. **SLOPRD-31**

4-16-10 Policy 2.3 - Please be clear this is for development of the pocket parks and that the applicant does not propose to develop the neighborhood park or prepare a Master Plan for the neighborhood park site. **SLOPRD-32**

Policy 2.4 - Please note the application does not plan to develop the neighborhood park. **SLOPRD-33**

Policy 2.5 – The Policy is about park development and your response refers to parkland. This is why the distinction between the applicants offer to dedicate the neighborhood park site and an actual developed park needs to be made clear in this EIR. The developer is developing pocket parks but they are not developing the neighborhood park so I call this partially inconsistent. **SLOPRD-34**

Page 4.16.10 Objective B- please mention that the applicant does not propose to develop the neighborhood park. and that accepting a sub par sized park site in a location that would leave most of Nipomo without a nearby park is not consistent with the Park and Recreation Element's project list. **SLOPRD-35**

Page 4.16.11 Policy 3.1.- Does this consistent determination remain even though the applicant will not develop the neighborhood park? **SLOPRD-36**

Policy 3.2- Please see response to Policy 2.1. **SLOPRD-37**

Objective C - Please mention that the proposed trails are consistent with the project list in the Park and Recreation Element. **SLOPRD-38**

Policy 3.7 - Please mention that the proposed trails connect to area trails called out in the Park and Recreation Element and nearby Nipomo Community Park. **SLOPRD-39**

Policy 3.12.- Discussion does not seem relevant. Please omit. **SLOPRD-40**

Policy 3.13 - Response Trails are shown in the Proposed Specific Plan. **SLOPRD-41**

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Page 4.16.14 Policy 4.3. - Potentially Consistent**.** The project's proposed open space, trails and pocket park amenities. **SLOPRD-42**

Page 4.16.15 - Please include a discussion Policy 5.1 this will help explain how County Parks decides to direct resources needed to develop the neighborhood park that is offered but not developed with this project. **SLOPRD-43**

Page 4.16.15, Goal 6 and Objective H - Please include a discussion. These outline the need for outside funding for development and maintaining County Parks **SLOPRD-44**

Goal 7 and Objective I - Please include a discussion. These outline the need for maintenance funding for park facilities. The applicant does not propose to provide a maintenance mechanism for the maintenance of the neighborhood park. **SLOPRD-45**

Policy 6.4.- This project does not include the development of a new neighborhood park and it is inconsistent with this policy. **SLOPRD-46**

Policy 6.5-Please include a discussion on this policy. This policy requires County Parks to review a park site dedication based on the size minus infrastructure and easements. This relates to the offer of the neighborhood park. County Parks must review the sites potential based on the net size of the site. What is the net size of the neighborhood park? Does it meet the larger than 10-acre size called out in the Park and Recreation Element**?** **SLOPRD-47**

Policy 6.6.-The project is inconsistent with this Policy. The neighborhood park site is encumbered with drainage ways and basins that support the residential development of Specific Plan that detract from the use of the park for the benefit of the applicant. **SLOPRD-48**

Policy 6.7 - project is inconsistent because it does not proposed maintenance of the neighborhood park **SLOPRD-49**

Page 4.16,17 Parks South County Land Use Programs response- This project does not proposed to develop a neighborhood park and this response doesn't respond to the sited program. Maybe remove it because it doesn't appear to be relevant. **SLOPRD-50**

Page 4.16.19 - Discussion on regional parks is not relevant to this project. **SLOPRD-51**

Page 4.16.20 -Discussion assumes development of the neighborhood park will happen with the Specific Plan. The applicant does not propose to develop the neighborhood park and it will take decades for the County to fund development of the proposed neighborhood park. Based on the uncertainty of if and when the neighborhood park will be developed, the increased demand for recreation features created by this proposal will not be offset by the proposed neighborhood park for 20 to 50 years or at all. **SLOPRD-52**

Rec Impact 1 - Please revisit this section with the understanding that the applicant is not proposing to develop the neighborhood park. The County does not have funds to develop this park and it will take 20 to 50 years before the County can fund development of this park if at all. **SLOPRD-53**

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REC Impact 2 - Please revisit this section with the understanding that the applicant is not proposing to develop the neighborhood park and it will take 20 to 50 years before the County can fund development of this park if at all.

REC Impact 3: Please revisit this section with the understanding that **the** applicant is not proposing to develop the neighborhood and it will take 20 to 50 years before the County can fund development of this park if at all.

SLOPRD-53 (cont'd)

Cumulative Impacts please revisit section considering the applicant is not proposing to develop the neighborhood and it will take 20 to 50 years before the County can fund development of this park if at all.

SLOPRD-54

Thank you for the opportunity to respond to this Draft EIR. Please feel free to contact me if you need additional information on any of these comments.

Sincerely,

Elizabeth Kavanaugh
Parks and Trails Planner

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9.2.9.1 Response to Letter from County of San Luis Obispo Parks and Recreation Department

Comment No.	Response
SLOPRD-1	The comment requests clarification that the applicant does not propose development of the neighborhood park, and instead proposes to dedicate undeveloped land for the neighborhood park for the County to develop. As originally proposed, the project included dedication of an approximately 10-acre parcel for use as a public park within the Specific Plan Area. As discussed in Section 4.16, Recreation, the Quimby Act (AB 1191) authorizes counties and cities to require the dedication of land or payment of fees for park and recreational purposes as a condition of the approval of a tentative or parcel subdivision map if specified requirements are met. The County's Quimby Ordinance (Sections 21.09.010 through 21.09.060 of the County Code) requires, as a condition of any subdivision of land, a dedication of land or payment of fees in lieu of a dedication of land (referred to as "Quimby" fees) for the purpose of developing new or rehabilitating existing parks or recreational facilities. Where usable common open space that meets certain criteria is proposed to be dedicated, the Quimby Ordinance allows for partial credit (not to exceed 50%) of the required Quimby fees; this waiver of fees is contingent upon a County finding that it is in the public interest (Section 21.09.020). The project, as originally designed and evaluated in the Draft EIR, proposed a 10-acre dedication of usable open space and sought a 50% waiver of Quimby fees in exchange for that dedication of land, consistent with Section 21.09.020. This has been clarified in Section 2.5.3.2 of the EIR. Through further consultation with the County Parks and Recreation Department (County Parks) subsequent to circulation of the Draft EIR, it has become clear that County Parks does not recommend County approval of any dedication of land within the Specific Plan Area in lieu of full payment of Quimby fees. The primary reason for this is that the Nipomo area already has adequate and readily available undeveloped parkland (which is documented in Section 4.15, Public Services, and Section 4.16, Recreation, of the Draft EIR) and instead, what the area needs is funding (e.g., through payment of Quimby fees) to develop that land with additional recreational facilities/amenities. Therefore, the project has been modified to include an approximately 7.5-acre passive park/open space area (with limited amenities). The project also proposes to pay Quimby fees in accordance with the County's Quimby Ordinance and County Parks' recommendations. The passive park would be maintained by the development (likely an HOA or similar entity) but would be open to the general public. As evaluated in Section 4.15, *Public Services*, and Section 4.16, *Recreation*, based on regional and community parkland estimates identified in the County's *2016–2018 Resource Summary Report,* there is adequate existing regional and community park facilities to serve the existing population in addition to the additional population generated by the project; therefore, construction of new recreational facilities would not be necessary to reduce impacts related to an increase in demand on public park facilities. As such, this change would not result in a change to the impact determinations included in these sections. No further changes to the EIR are required to respond to this comment. This change in the project (and others made in response to comments received on the Draft EIR) have been more fully described and analyzed in Chapter 10.
SLOPRD-2	The comment requests explanation of what a Quimby Fee is and what it is used for and that the applicant is asking for Quimby Fee Credit for the undeveloped land proposed as a future neighborhood park. Refer to Response to Comment SLOPRD-1. Based on correspondence with County Parks, there would not be adequate funding for development or long-term maintenance of the proposed public neighborhood park, which could be inconsistent with General Plan policies related to provision and funding for public park facilities. This potential policy inconsistency is noted in Table 4.16-3 of the Draft EIR. No changes to the Draft EIR are required in response to this comment. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-3	The comment requests clarification regarding the size of the neighborhood park site proposed to be dedicated to the County. As stated in Chapter 2, *Project Description*, the DRSP includes a 10-acre public neighborhood park in addition to an approximately 1.01-acre equestrian trailhead and staging area and between 8.5 and 12 acres of publicly accessible (but privately maintained) pocket parks within residential neighborhoods. Refer also to Response to Comment SLOPRD-1.
SLOPRD-4	The comment requests clarification regarding the size of the proposed neighborhood park minus drainageways and drainage basins. Based on rough calculation estimates, the proposed neighborhood park would be approximately 9.6 acres excluding the drainageways and drainage basins. No changes to the Draft EIR are required in response to this comment. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-5	The comment asks if the applicant proposes to develop the proposed equestrian staging. The Applicant would develop the equestrian trailhead/staging area. This comment does not identify any deficiency in the Draft EIR; therefore, no changes to the environmental document are necessary.

Comment No.	Response
SLOPRD-6	The comment requests that the word "public" be removed from "public neighborhood park" throughout the EIR because County Parks has not agreed to accept this park on behalf of the public. A clarifying statement has been added to Section 2.5.3.2, *Conservation, Open Space, and Recreation*. Because the project proposed a "public" neighborhood park, the EIR correctly reflects the proposed project; therefore, no further changes to the EIR are required in response to this comment. Please also refer to Response to Comment SLOPRD-1 and Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-7	The comment refers to PS Impact 4 and states that the project will result in an increased demand on public park facilities and asks if Mitigation Measure PS/mm-1.1 is sufficient. As evaluated under PS Impact 4, based on regional and community parkland estimates identified in the County's *2016–2018 Resource Summary Report,* there is adequate existing regional and community park facilities to serve the additional population generated by the project, and implementation of the project would not facilitate the need for new or physically altered public park facilities. In addition, the project proposed dedication of land and partial (50%) payment of Quimby fees in accordance with the terms of the County's Quimby Ordinance. The ordinance is intended to ensure the County can provide necessary parks and recreational facilities within the county to serve development. Because the County has adequate existing parkland acreage to serve the existing population in addition to the population increase generated by the DRSP, impacts related to an increase in demand on public park facilities were determined to be less than significant, and mitigation measures were not required to reduce impacts. Refer also to Response to Comment SLOPRD-1 and Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-8	This comment refers to REC Impact 1 and asks why mitigation was not included. As evaluated under REC Impact 1, based on the amount of existing regional and community recreational facilities identified in the County's *2016–2018 Resource Summary Report,* the increase in population associated with the proposed project is not anticipated to result in substantial physical deterioration of existing parks or other recreational facilities. The County has adequate existing parkland and recreational facilities, including regional parks like Nipomo Community Park, regional trails, multiple golf courses, and recreational opportunities at the ocean, to serve the existing population in addition to the population increase generated by the DRSP. Therefore, impacts related to an increase in demand on public park facilities were determined to be less than significant, and mitigation measures were not required to reduce impacts. In addition, although not necessary to reduce impacts related to an increase in demand on public park and recreational facilities, buildout of the specific plan area includes dedication of land for a public park, 8.5 to 12 acres of pocket parks, an equestrian trailhead, and over 7 miles of trails, which would provide park and recreational facilities to residents of the DRSP area and reduce the need for DRSP residents to use other public park and recreational facilities in a manner that could lead to physical deterioration of existing off-site facilities. As described in Chapter 10, the project has been revised to propose a privately-maintained 7.5-acre passive park and full payment of Quimby fees. These fees would help fund additional park and recreational improvements as determined by County Parks. Therefore, no changes to the Draft EIR are required in response to this comment.
SLOPRD-9	This comment states that the Draft EIR should include an alternative that does not impact recreational facilities. As identified in Chapter 5, Alternatives Analysis, California Environmental Quality Act (CEQA) Section 15126.6(a) requires an Environmental Impact Report (EIR) to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." As evaluated in Section 4.15, Public Services, and Section 4.16, Recreation, impacts related to an increase in demand on public park and recreational facilities would be less than significant (refer to SLOPRD-7 and SLOPRD-8). Because these impacts have been identified as less than significant, the alternatives analysis is not required to include an alternative that would lessen the project's impacts on public parks and recreational facilities. In addition, as described in Chapter 10, the project has been modified to propose a 7.5-acre passive park and full payment of Quimby fees. This change was the result of increased coordination with County Parks. Therefore, no changes to the Draft EIR are required in response to this comment.
SLOPRD-10	This comment asserts that Section 6, Areas of Controversy, in the *Executive Summary* should include public parks. This revision has been made in the *Executive Summary*. Refer also to Response to Comment SLOPRD-1, above, and Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-11	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-12	Refer to Response to Comment SLOPRD-1, above. In addition, the referenced sentence in Section 2.5.3.2 has been revised to replace "would" with "could".
SLOPRD-13	Refer to Response to Comment SLOPRD-1, above. Also, Figure 2-24, *Off-Site Transportation Improvements*, of the EIR reflects the anticipated buildout of backbone infrastructure. As shown in Table 2-11, *Dana Reserve Specific Plan Anticipated Buildout Schedule*, the public park is anticipated to be constructed near the middle of the full buildout schedule for the Specific Plan Area. In addition, trails, pocket

Comment No.	Response
	parks, and similar amenities would be constructed concurrent with the neighborhoods they would be serving. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-14	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-15	This comment refers to the Existing Setting of Section 4.15.1, *Public Services*, which identifies existing parkland levels of severity and describes the existing regional and community levels of service as identified in the County's *2016–2018 Resource Summary Report.* Section 4.15.1.4.2 has been revised to clarify how the parkland level of severity is measured. No other changes to the Draft EIR are necessary in response to this comment.
SLOPRD-16	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-17	This comment states that General Plan policies related to land acquisition, development, and maintenance should be included in Section 4.15.10 of the EIR. The General Plan policies referred to in this comment are identified and evaluated in Section 4.16, *Recreation*, of the Draft EIR; a reference to these policies has also been added to Section 4.15.2.3.2 of the EIR.
SLOPRD-18	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-19	This comment refers to the evaluation of Policy 2.2 of the County's General Plan Parks and Recreation Element and requests that additional text be added to the evaluation. The additional text identifies the project's increase in demand on recreational facilities, the Applicant's request to waive the payment of 50% of the required Quimby fees, that the proposed public neighborhood park would not be developed within the same buildout timeframe as the DRSP area, and that the cost of development and maintenance would be tens of millions of dollars. This information has been added to the Draft EIR and substantiates the EIR's determination that the project could be potentially inconsistent with this policy. Refer also to Response to Comment SLOPRD-1, above, and Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-20	This comment refers to Policy 2.4 of the County's Parks and Recreation Element in Table 4.15-4, *Preliminary Policy Consistency Evaluation*, of the Draft EIR and asserts that the project would be inconsistent with this policy because the proposed public neighborhood park would have little to no recreational components, would have a buildout time of 20 to 50 years (if at all), and would cost the County tens of millions of dollars to develop and maintain. Even without the public neighborhood park, the DRSP area would still provide walking trails, equestrian trails, open space, and pocket parks within neighborhoods that would provide both active and passive recreation, consistent with this policy. The Draft EIR has been clarified to reflect the proposed dedication of undeveloped land; however, no additional changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above, and Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-21	This comment refers to Policy 2.5 of the County's Parks and Recreation Element in Table 4.15-4, *Preliminary Policy Consistency Evaluation*, of the Draft EIR and asserts that the project is inconsistent with this policy based on the small size, short distance from and existing community park, and cost of development and maintenance. Approximately 8.5 to 12 acres of pocket parks would be developed concurrently with the associated neighborhoods and trails would be developed during Phases 1 and 2 of the proposed project, which would be developed by the Applicant and maintained by the homeowner's association (HOA). These recreational features represent private development of recreational facilities, consistent with the intent of this policy. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-22	The Draft EIR's evaluation of Goal 1, Objective A, and Policy 2.1 Table 4.16-3, *Preliminary Policy Consistency Evaluation*, of the Draft EIR has been revised to clarify the project proposes dedication of undeveloped parkland. The Applicant would develop the equestrian trailhead/staging area. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-23	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-24	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-25	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-26	This comment refers to the evaluation of Policy 2.2 of the County's General Plan Parks and Recreation Element. Minor clarifications have been made to this section of the EIR, consistent with this comment. No further changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-27	Refer to Response to Comment SLOPRD-1, above.

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SLOPRD-28	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-29	Minor clarifications have been made to Table 4.16-3, *Preliminary Policy Consistency Evaluation*, of the EIR have been made in response to this comment. No other changes are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-30	Refer to Response to Comment SLOPRD-1, above.
SLOPRD-31	This section of the EIR has been revised to clarify that the project, as originally proposed, would dedicate approximately 10 acres of undeveloped land for future park/recreational uses. No further changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-32	This section of the EIR has been revised to clarify that the project, as originally proposed, would dedicate approximately 10 acres of undeveloped land for future park/recreational uses. No further changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-33	This section of the EIR has been revised to clarify that the project, as originally proposed, would dedicate approximately 10 acres of undeveloped land for future park/recreational uses. No further changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-34	This section of the EIR has been revised to clarify that the project, as originally proposed, would dedicate approximately 10 acres of undeveloped land for future park/recreational uses. No further changes to the EIR are required in response to this comment. Refer also to Response to Comment SLOPRD-1, above.
SLOPRD-35	This comment refers to the evaluation of Objective B of the County's General Plan Parks and Recreation Element found in Table 4.16-3, *Preliminary Policy Consistency Evaluation*, of the Draft EIR. This comment requests that this evaluation clearly state that the Applicant does not propose to develop the neighborhood park and that accepting the proposed park would be inconsistent with the County's Parks and Recreation Element based on its small size and location near an existing community park. This evaluation concludes that the project would be inconsistent with this objective, which is consistent with this comment. However, the evaluation of Policy 2.3 will be revised to clearly reflect that the Applicant does not include the development of the proposed public neighborhood park. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-36	This comment refers to the evaluation of Policy 3.1 of the County's General Plan Parks and Recreation Element. The comment asks if this evaluation would remain potentially consistent even though the applicant does not propose to develop the neighborhood park. Per the analysis in this section of the EIR, the conclusion that the project would be potentially consistent with Policy 3.1 remains the same. Refer also to Response to Comment SLOPRD-1 above.
SLOPRD-37	Refer to Responses to Comments SLOPRD-1 and SLOPRD-22 above.
SLOPRD-38	This comment refers to the evaluation of Objective C of the County's General Plan Parks and Recreation Element found in Table 4.16-3, *Preliminary Policy Consistency Evaluation*, of the Draft EIR. This comment requests that this evaluation state that the proposed trails are consistent with the project list in the Park and Recreation Element. This clarification has been added.
SLOPRD-39	This comment requests that the evaluation mention that the proposed trails connect to area trails called out in the Parks and Recreation Element and nearby Nipomo Community Park. This clarification has been added.
SLOPRD-40	This comment questions the relevance of the evaluation of Policy 3.12 of the County's Parks and Recreation Element. This policy has been deleted from Table 4.16-3.
SLOPRD-41	This comment states that trails are shown in the proposed specific plan. This is in compliance with this policy; therefore, no changes to the Draft EIR are necessary.
SLOPRD-42	This comment requests minor clarifications to the evaluation of consistency with Policy 4.3. This clarification has been made.
SLOPRD-43	This comment requests that Policy 5.1 of the County' General Plan Parks and Recreation Element be described in the Draft EIR. Policy 5.1 is described under Section 4.16.2.3.1, *County of San Luis Obispo General Plan*, which explains how County Parks decides to direct its resources needed to develop public parks. Therefore, no changes to the Draft EIR are necessary.
SLOPRD-44	This comment requests that an evaluation of Goal 6, Objective H of the County' General Plan Parks and Recreation Element be included in the Draft EIR. This revision has been made in the Draft EIR. Refer also to Response to Comment SLOPRD-1 above.

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SLOPRD-45	This comment requests that an evaluation of Goal 7, Objective 1 of the County' General Plan Parks and Recreation Element be included in the Draft EIR. This revision has been made in the Draft EIR. Refer also to Response to Comment SLOPRD-1 above.
SLOPRD-46	This comment refers to the evaluation of Policy 6.4 of the County's General Plan Parks and Recreation Element and states that the project is inconsistent with this policy because it does not propose the development of the public neighborhood park. The evaluation of this policy concluded that the project is potentially inconsistent with this policy, which is consistent with this comment. As such, no changes to the Draft EIR are necessary. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-47	This comment requests that an evaluation of Policy 6.5 of the County' General Plan Parks and Recreation Element be included in the Draft EIR. This revision has been made in the Draft EIR.
SLOPRD-48	This comment refers to the evaluation of Policy 6.6 of the County's General Plan Parks and Recreation Element and states that the project is inconsistent with this policy because the proposed public neighborhood park is encumbered with drainage ways and basins that detract from use of the park. The policy is intended to protect existing parks from new development. As stated in the EIR, the project site is not adjacent to and would not detract from adjacent park or natural area resources. Refer also to Response to Comment SLOPRD-48.
SLOPRD-49	This comment refers to the evaluation of Policy 6.7 of the County's General Plan Parks and Recreation Element and states that the project is inconsistent with this policy because it does not propose maintenance of the public neighborhood park. This proposal is consistent with the County Quimby Ordinance (Sections 21.08.010 through 21.09.060 of the County Code), which is codified in the County Code and meets the requirements of this Goal and Objective. No changes to the EIR are necessary. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed neighborhood park in response to these comments.
SLOPRD-50	This comment suggests deletion of the South County Inland Area Plan Land Use Program analysis as not relevant to the proposed project. This item has been deleted.
SLOPRD-51	This comment refers to REC Impact 1 and asserts that the discussion of regional parks is not relevant to this project. As stated in Section 4.16.3, *Recreation Threshold of Significance*, thresholds of significance are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the county and discussion of regional parks is consistent with CEQA Appendix G guidelines. Therefore, no changes to the Draft EIR are necessary. Refer also to Response to Comment SLOPRD-1 above.
SLOPRD-52	Refer to Response to Comment SLOPRD-1 above.
SLOPRD-53	This comment asserts that the evaluation of REC Impact 1 through REC Impact 3 should be revised with the understanding that buildout of the proposed public neighborhood park would not occur within the timeframe for buildout of the DRSP area. REC Impact 2 refers to off-site infrastructure improvements; no changes to the EIR are necessary. Clarifications have been made to REC Impact 1 and REC Impact 3. Refer also to Response to Comment SLOPRD-1 above.
SLOPRD-54	Clarifications have been made to REC Impact 4 to reflect the proposed dedication of undeveloped land for future development of a public park, which could take several years beyond build-out of the Specific Plan Area. Refer also to Response to Comment SLOPRD-1 above.

9.2.10 Nipomo Community Services District (via RWG Law)

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August 1, 2022

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Re: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

I serve as legal counsel to the Nipomo Community Services District ("NCSD" or "District"). On behalf of NCSD, we submit the following comments on the Draft Environmental Impact Report ("DEIR"), State Clearinghouse No. 2021060558, dated June 2022, which was prepared by San Luis Obispo County ("County") in connection with the proposed Dana Reserve Specific Plan and associated land use entitlements (the "project"). As noted in the DEIR, NCSD is a responsible agency for the project as defined in CEQA Guidelines Section 15381, and would rely on the Final EIR (if certified by the County) as a part of its consideration of the project developer's application for annexation into the District.

NCSD requests that the DEIR be revised as requested in this letter, and that NCSD's comments and the County's responses be included in the Final EIR in accordance with CEQA Guidelines Section 15088.

Executive Summary

1. Table ES-1: The 22.3 acres shown for "Village and Flex Commercial" zones is not consistent with the 18.9 total acres listed for those use categories in table 4.19.19. 18.9 acres of commercial development was evaluated in NCSD's Water and Wastewater Service Evaluation for the project dated March 30, 2022 (See Table 2.5). The March 30, 2022 evaluation superseded the February 7, 2022 version that was incorrectly included in the DEIR as Appendix H. Please correct table ES-1 and replace the February version of the evaluation with the attached March 30, 2022 version. **NCSD-1**

2. Under Project Objectives, item 10 should include meeting State law requirements for energy efficiencies and State law and NCSD policies and ordinances relating to water conservation. In item 13 please add the words "and Annexation Policy" between "District Code" and "to ensure…." Also, please add the words "funds or" between "DRSP" and "constructs…." Same comments on pages 2-14 and 5-2. **NCSD-2**

3. Mitigation Measure AES/mm-3.1 (wherever it appears in the document): For clarity, this mitigation measure should refer to the numerical tree replacement ratio required in BIO/mm-18.2. **NCSD-3**

4. Mitigation Measure AQ/mm-3.2 (wherever it appears in the document): Please note that reclaimed water is not available from the District. Further, requiring the contractor or builder to "consider" use of an approved dust suppressant to reduce the amount of water used during construction is not a specific action to reduce or eliminate an impact of the project, and thus not an adequate mitigation measure. The contractor and developer should be required to use approved dust suppressants instead of water if feasible. *See*, AQ/mm-3.3(5). **NCSD-4**

5. Mitigation Measure BIO/mm-1.1 (wherever it appears in the document): Please clarify that this measure applies to both off-site improvements and the specific plan area (see BIO impact 11). **NCSD-5**

6. BIO impacts 11-13 (wherever this discussion appears in the document): Do these activities require permits from CDFW and USFWS? If so, the mitigation measures should so-specify and note that obtaining and complying with the permits would be the obligation of the applicant. **NCSD-6**

7. Mitigation Measures BIO/mm-12.1 and 13.1 (wherever they appear in the document): These mitigation measures should be revised to provide that the studies, project biologist's work, relocation, nesting bird surveys, other mitigations and their costs, permit costs, and costs of avoidance are all the applicant's responsibility. **NCSD-7**

8. BIO Impacts 16, 17, and 19, and Mitigation Measures BIO/mm-16.1, 17.1, 17.2, 17.3 and 19.1 (wherever they appear in the document): All existing NCSD water and sewer lines are attached to the underside of SLO County's Nipomo Creek Bridge, which reduces or eliminates impacts to the Creek. The proposed upsized water line in this area also would be attached to the underside of the bridge to avoid impacts and disturbance to the Creek. All compliance obligations in the mitigation measures must be made at the applicant's cost. **NCSD-8**

9. BIO/mm-17.1 and 17.2 (wherever they appear in the document): clarify that all requirements listed for NCSD including, without limitation, retaining a biologist and **NCSD-9**

complying with these measures and any permit conditions, shall be at the applicant's expense. **NCSD-9 (cont'd)**

10. Mitigation Measures CR/mm-1.1, 2.2, 2.3 and 2.4 (wherever they appear in the document): Please make the language of 1.1 consistent with 2.2, 2.3 and 2.4 to reflect that the applicant will fund and complete the Historical Resources Evaluation. Please revise all CR mitigation measures to provide that the mitigation measures would be the applicant's obligation to fund and complete. **NCSD-10**

11. GEO Impact 9, implementation of Mitigation Measures GEO/mm-8.1 through GEO/mm-8.3 (wherever they appear in the document): See comment regarding CR/mm-1.1. **NCSD-11**

12. Mitigation Measure N/mm-1.1 and discussion of noise impacts (wherever they appear in the document): Note that construction of off-site NCSD improvements may require night construction activities between the hours of 10 p.m. and 6 a.m. to avoid impacts to customers and systems associated with the connection of water and wastewater improvements to existing NCSD systems. Under County LUO Section 22.10.120(A)(7), the noise and construction hour limitations do not apply to NCSD's work on the maintenance or modification of its facilities. That correction should be throughout the document where the reference to Section 22.10.120 appears. **NCSD-12**

13. Noise Impact 2: See comment above regarding Mitigation Measure N/mm-1.1 and the applicability of the County's Land Use ordinance. **NCSD-13**

14. Impact PS 1: Mitigation Measure PS/mm-1 should be labeled in this chart. As drafted, the mitigation measure is inadequate to support the conclusion that the project's impact on the need for fire services will be mitigated. As drafted, the mitigation measure does not require that a new fire station be constructed, as the discussion of the impact seems to require. Simply dedicating land for a new fire station does not guarantee that fire services and responses will be improved. When will the dedication be required? When will the new fire station be constructed? What will be the mechanism be to guarantee that new fire station is constructed, equipped and staffed? Is a new fire station required before the first certificate of occupancy is issued, or at some later point? **NCSD-14**

15. Mitigation Measure WF/mm-3.1 (wherever it appears in the document): NCSD will require vehicular access for NCSD vehicles for all NCSD maintained water and sewer improvements located in any easement or open space area. However, note that NCSD typically does not accept facilities located in easements, unless no other reasonable alternative exists. **NCSD-15**

16. Mitigation Measure USS/mm-3.1: This measure should be revised to require the NCSD's "approval" rather than "affirmative concurrence" pursuant to the findings required under **NCSD-16**

NCSD's annexation policy and the District's standards for new water and wastewater services. **NCSD-16 (cont'd)**

17. Under Section 6, Areas of Controversy, please note that the adequacy of the potable water supply has also been raised as areas of controversy, although NCSD's evaluation shows that there is sufficient water supply available to serve the project, as detailed in the correct version of Appendix H. **NCSD-17**

18. Description of Alternate 5. It seems that this alternative might reduce identified impacts to public services including water and wastewater. See comments below regarding the alternatives analyses. **NCSD-18**

Project Description

19. Section 2.2.1.2.2: Item 2 under Wastewater System Improvements should include the words "and force main" after "sewer lift station" and, in item 4, note that the improvements at the Southland plant were analyzed in the EIR NCSD certified for the Southland Wastewater Treatment Facility in 2011. Same comment as to item 4 at the top of page 2-47. **NCSD-19**

20. Page 2-8, footnote 3: The text should be revised to note that the project was planned as a part of the NCSD's 2007 Masterplan. The CEQA analysis for the increased pipe size was completed and approved by the NCSD Board in March of 2020. Same comment as to footnote 6 on page 2-47. **NCSD-20**

21. Section 2.5.2, second paragraph: Please revise to note that a responsible agency also could be required to make consistency determinations relating to this EIR, not just the County. See the last sentence of Section 2.5.3.4.4, for example. **NCSD-21**

22. Page 2-25: Are ADU estimates included in the number of units listed in Table 2.5? **NCSD-22**

23. Section 2.5.3.4.3 and Figures 2-20, 2-21 and 2-22: The text should note that all water and sewer lines dedicated to, and accepted by, NCSD must be located within public streets or dedicated property. NCSD does not accept easements unless no reasonable alternative exists. For new development, the project can be designed to avoid using easements alternatives. On Figures 2-20 and 2-22, and on figures 4.19-2 and 4.19-3, please clarify that the labeled 16" water line and 12" sewer line do not currently exist. **NCSD-23**

24. Pages 2-46, item 2 under Off-Site Wastewater System Improvements please add the words "and force main" after "sewer lift station." **NCSD-24**

25. Table 2-11: Total units for NBD 9 shown is inconsistent with the information in Table 2-4. **NCSD-25**

26. Table 2-11: Please verify and correct the unit numbers in the vertical columns for residential multi-family development DR-SF2, which do not appear to match. Otherwise, clarify why the combined numbers in each NBD do not add up to the totals provided. **NCSD-26**

27. Page 2-57: The description of the NCSD Board's potential annexation actions following the County's potential approval of the requested project entitlements is not complete. The applicant has already submitted an annexation application to NCSD. If the requested entitlements are approved, the NCSD Board will consider the requested annexation pursuant to its Annexation Policy, approved through Resolution 2020-1549. As noted several times in this comment letter, NCSD's Annexation Policy is a critical policy document that should be included in the DEIR's analysis. The NCSD Board also will consider an annexation agreement between NCSD and the developer, and a Property Tax Revenue Exchange Agreement to be negotiated between NCSD and the County. If the applicant complies with the conditions of NCSD's annexation policy and the District's Board approves the above-described documents, SLOLAFCO would consider the annexation proposal thereafter. The last sentence of this paragraph should be revised to provide that "SLOLAFCO would then coordinate with the County and NCSD to ensure that a proper plan of services is in place to guide orderly development of the annexed property." **NCSD-27**

Environmental Setting

28. Section 3.2.1.10: The Nipomo Community Services District Code and its Annexation Policy, adopted through Resolution No. 202-1540, are applicable to the project and should be described in this Section. **NCSD-28**

Environmental Impacts Analysis

29. In general, for all mitigation measures that may be applicable to off-site improvements or work done by or with NCSD in connection with the project, NCSD requests that each mitigation measure be revised as necessary to clarify that all work required by that measure will be at the applicant's expense. **NCSD-29**

Section 4.4 Biological Resources

30. For discussion of potential biological impacts of off-site improvements in the area of Nipomo Creek, including in Section 4.4.1.3.3, please note our comments above regarding BIO Impacts 16 and 17, and the location of NCSD improvements in relation to Nipomo Creek. This issue is especially important to the analysis of potential impacts to habitat, since the Creek itself need not be disturbed. **NCSD-30**

31. Section 4.4.1.3.3: The "wetland delineation" for off-site improvements should not be deferred. While the off-site improvements are not designed, the general locations are **NCSD-31**

known. The DEIR makes a determination on these issues for the "Specific Plan Area" in Section 4.4.1.2.3. At a minimum, this section should specify that the "wetland delineation" for the off-site improvements must be completed at the applicant's expense and prior to the NCSD's consideration of any annexation application, but it is not clear that later completion would protect the EIR against a "deferred mitigation" challenge. NCSD believes the work should be done before the EIR is certified. **NCSD-31 (cont'd)**

32. Mitigation Measure BIO/mm-1.1: Please clarify whether the term "within the project area" includes off-site areas as well as the Specific Plan area. **NCSD-32**

Section 4.15 Public Services

33. PS Impact 1: See comment above regarding Mitigation Measure PS/mm-1. The text of Section 4.15 makes vague reference to the project's contribution to the County's Public Facilities Fees to off-set "project specific" impacts related to increased demand for fire services but does not identify how the developer's payment of those fees over a significant period of time (presumably tied to building permit applications) will guarantee that there is a fire station, firefighters and equipment on-site when the impacts of this development begin to be experienced by the residents of Nipomo. Section 4.15 also notes that the project's payment of the Facilities Impact Fee will fund improvements to County parks and libraries too, so it is not at all clear how the fire station will be funded and built, or when. The discussion of the impact notes that subsequent CEQA review of the fire station project will be required, but does not specify how, when, or at whose cost that review will be conducted. Without that level of specificity the DEIR's conclusion that impacts will be less than significant after mitigation is not supported. **NCSD-33**

34. Section 4.15.6: In the discussion of cumulative impacts on public services, the DEIR states: "Development of a new CAL FIRE station in the community of Nipomo would further reduce response times by providing additional firefighters, fire engines, and other equipment to serve the area." Again, the dedication of land for a fire station and the payment of a County fee over time, without more, will not "further reduce response times." Comments regarding Impact PS 1 are restated here. **NCSD-34**

Section 4.19 Utilities and Service Systems

35. Page 4.19-3, last paragraph: After the words "groundwater supply" please add "though diminishing as a result of the drought," and add "under current projections" after "is considered reliable." Also, please add the following sentence: "Under NCSD's Annexation Policy, any property annexed to the District is to be served only by imported water." This added sentence would also be appropriate to add to the imported water discussion on page 4.19-4. **NCSD-35**

36. Page 4.19-4, second full paragraph: The sentence that begins "[p]ortions of the…" should be revised to read as follows: "The Santa Maria River crossing 24-inch pipeline of the NSWP was designed with a delivery limit of 6,200 AFY of water. However, the license agreement between the County of Santa Barbara and NCSD, that limits the permissible delivery to 3,000 AFY, would need to be amended to allow NCSD full use of the NWSP's pipeline design limit of 6,200 AFY." **NCSD-36**

37. Tables 4.19-10, 11 and 12: The number of annexations under review should be 176, pursuant to NCSD's Urban Water Management Plan. **NCSD-37**

38. The years in Table 4.19-12 are mislabeled. The years should be 2021-2025. The groundwater supply total line should read 1,267 in each column. **NCSD-38**

39. Table 4.19-4: It is not entirely clear which data from the MKN report is incorporated in this table, but the "Peak Hour Flow" line appears to be incorrect. Based on Table 3-13 of the MKN report, however, this number should be 1.5 mgd. **NCSD-39**

40. Table 4.19-16: In the 10 year water production column, the "residential suburban" line should read 96,198 under the DR Evaluation, pages 3-6. **NCSD-40**

41. Pages 4.19-8 and 4.19-13: Appendix H, as circulated with the DEIR is the incorrect version of the water evaluation, as stated above. We do not believe that this update materially changes the impacts analysis. Please correct. **NCSD-41**

42. Page 4.19-17: IWMA does not actually "oversee local waste providers." The appropriate term instead of "waste producers" would be "waste hauler" or "waste disposal services provider." More important, each individual community member of IWMA "oversees" its waste hauler through a franchise agreement and, in the case of NCSD, local ordinances. IWMA provides compliance and monitoring services to its member agencies. **NCSD-42**

43. Section 4.19.2.3.4: Again, NCSD's Annexation Policy and the District Code are part of the regulatory framework applicable to the project. For example, the six stages of drought response noted in the text are enforced through the NCSD Code. The Annexation Policy, as just one example, requires that new annexations be served only with imported water, which emphasizes the need for Santa Barbara County to drop its arbitrary limit on the amount of water Nipomo may import under the license agreement for the Nipomo Supplemental Water Project, as NCSD has repeatedly requested. Table 4.19-17 should be updated accordingly. **NCSD-43**

44. Page 4.19-31, second paragraph under "Construction": Note that construction of off-site NCSD improvements may require night construction activities between the hours of 10 p.m. and 6 a.m. to avoid impacts to customers and systems associated with the connection of water and wastewater improvements to existing NCSD systems. Under **NCSD-44**

County LUO Section 22.10.120(A)(7), the noise and construction hour limitations do not apply to NCSD's work on the maintenance or modification of its facilities. This exception should be noted throughout. **NCSD-44 (cont'd)**

45. Pages 4.19-31 through 43: As to the implementation of the mitigation measures listed in the analysis of impacts UPS Impacts 1-6, inclusive, note our previous comments regarding the applicant's responsibility for the costs of mitigation. **NCSD-45**

46. Page 4.19-35, first full paragraph: Same comment as number 41 above regarding construction hours. **NCSD-46**

47. Table 4.19-19, see comment above regarding Table ES-1. **NCSD-47**

48. Page 4.19-41: The discussion of peak flow conditions should refer to "peak hour flow" not "daily peak flows." **NCSD-48**

49. Table 4.19-21: The "Project Total Average Daily Flow" should read 228.86 rather than 228.68. "Project Peak Flow" should reflect hourly peak flows, not daily. **NCSD-49**

50. Page 4.19-46: With regard to SB 1383 compliance, IWMA does not require that haulers provide customers with "compost/green waste bin." Each local jurisdiction, including NCSD, is required by SB 1383 and CalRecycle regulations to impose that requirement on the waste hauler, **and** to require that customers in the jurisdiction comply with the organics recycling mandates. NCSD has adopted these requirements for its customers in the District Code and the Board approved an amendment to the solid waste franchise agreement to implement SB 1383. These requirements would apply to the properties in the project area, if annexation is approved. IWMA's role is to monitor compliance and enforce. These requirements were effective January 1, 2022 and enforcement is scheduled to start January 1, 2023. **NCSD-50**

Alternatives Analysis

51. Section 5.4.3: Alternative 2 is alternately referred to as "La Cañada Ranch or "Cañada Ranch." **NCSD-51**

52. Section 5.4.4.3 Analysis of Alternative 3: It is unclear how the proposed alternative could reduce residential development and possibly "preclude" annexation into NCSD due to the cost of infrastructure improvements, yet increase impacts related to utilities and service systems. Section 5.4.4.3.15 states that under this alternative the "demand on public services and facilities also would be substantially reduced." This same section then states that the impacts of off-site improvements would be similar to the proposed project. Section 5.4.4.3.19 then says that this alternative would require the construction of new and expanded utility infrastructure, and may include water storage tanks and septic **NCSD-52**

systems, which would *increase* impacts to utilities and water service systems. NCSD disfavors any residential alternative that would not take domestic water service from the District due to the potential that such development would adversely impact groundwater resources. It is not clear that the County legally could approve such an alternative. Please clarify the impact statements in this section. **NCSD-52 (cont'd)**

53. Without further clarification of the impacts of Alternative 3, the conclusion that Alternative 3 is the Environmentally Superior Alternative is not supported by the text of the DEIR. **NCSD-53**

Chapter 7. Mitigation Monitoring and Reporting Program

54. Please ensure that NCSD's requested changes to mitigation measures are carried over into the MMRP. **NCSD-54**

Appendix C

55. Page 3: The location of the proposed lift station should be labeled. **NCSD-55**

56. Page 4: Please note on the diagram that approximately at the intersection of Camino Caballo and Frontage Road a transition from force main to gravity main may be required. **NCSD-56**

57. For clarity, the sewer lines shown on pages 8, 9, and 10 are existing. **NCSD-57**

NCSD appreciates the opportunity to review and comment on the DEIR. We look forward to seeing these comments and the County's responses incorporated into the Final EIR. If you have any questions regarding these comments, please contact Peter Sevcik, NCSD's Director of Engineering and Operations, who participated in the development of these comments, or me.

Very truly yours,

Craig A. Steele

cc: President and Members of the NCSD Board
Mario E. Iglesias, General Manager
Peter V. Sevcik, Director of Engineering and Operations

Attachment

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RICHARDS WATSON GERSHON

NIPOMO COMMUNITY SERVICES DISTRICT

DANA RESERVE DEVELOPMENT WATER AND WASTEWATER SERVICE EVALUATION

MARCH 30, 2022

NCSD-58

PREPARED FOR:

NIPOMO COMMUNITY SERVICES DISTRICT
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NIPOMO COMMUNITY SERVICES DISTRICT

DANA RESERVE DEVELOPMENT WATER AND WASTEWATER SERVICE EVALUATION

March 30, 2022

NCSD-58 (cont'd)

Report Prepared Under the Responsible Charge of:

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Michael K. Nunley, PE C61801

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Appendix C: Opinions of Probable Cost

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(cont'd)

1.0 INTRODUCTION

1.1 Description of Proposed Project

The Dana Reserve Development (Project) is a proposed multiuse neighborhood encompassing 288 acres of currently undeveloped land. The property is not within the Nipomo Community Services District (District) service area but is within the District's Sphere of Influence (SOI). The development includes a variety of single-family residences, condominiums, townhomes, and multifamily apartments. The development also incorporates open spaces and public parks, as well as various commercial uses including a village center, flex commercial/light industrial, neighborhood barn, hotel, daycare center, and a community college campus.

The developer has applied for annexation to the Nipomo Community Services District for water and wastewater services.

1.2 Purpose of Study

This study evaluated the impact this proposed development will have on District water and wastewater facilities. Recommended improvements from the Water and Sewer Master Plan Update (Cannon, 2007) and Southland WWTF Facility Master Plan Amendment 1 (AECOM, 2010) were reviewed to identify the improvements required to provide service to the project.

1.3 Scope of Work

The Scope of Work for the project included the following tasks:

NCSD-58 (cont'd)

Evaluation of Water Supply, Storage, and Distribution Facilities (Offsite and Onsite)

- Review Water Supply Assessment provided by developer and compare to District projections.
- Update existing water distribution system model with current demands from billing data and future demand from proposed annexation area.
- Review Water Master Plan, confirm status of master-planned projects, and update model with completed projects that may be necessary to support the development.
- Identify Master Planned projects which should be implemented to support the development.
- Perform model runs to identify offsite improvements necessary to support development. An evaluation of fire flow requirements, typical operating pressure ranges, and ability of the system to deliver Supplemental Water were performed. System storage requirements were also identified.
- Provide master-planning level cost opinion for proposed improvements, using unit costs escalated from previous master plans or planning documents.
- Evaluate onsite improvements recommended for development to confirm pipe sizes and pressure ranges are adequate for fire protection, maximum day, and peak hour demands.

Evaluation of Wastewater Collection Facilities (Offsite and Onsite)

- Place flowmeters at three (3) locations in the District sewer system for up to 30 days (to be performed by MKN's subconsultant, ADS).
- Review wastewater flow projections provided by developer and compare to District projections.
- Update existing collection system model with current flows from water billing data and future flows from proposed annexation area.
- Review Sewer Master Plan, confirm status of master-planned projects, and update model with completed projects that may be necessary to support the development.
- Identify Master Planned projects which should be implemented to support the development.
- Perform model runs to identify offsite improvements necessary to support development.
- Provide master-planning level cost opinion for proposed improvements, using unit costs escalated from previous master plans or planning documents.

Wastewater Treatment Capacity Evaluation

- Develop design flow and loading for the Southland Wastewater Treatment Facility under existing conditions. This analysis will include a review of past flow and loading records since the Phase I facility was completed; review of flow and loading projections from the Southland Wastewater Treatment Facility Master Plan (WWTF Master Plan); and a review of the flow and loading projections from the annexation area. The total flow and loading with contribution from the annexation area will be tabulated and compared to flows anticipated in the WWTF Master Plan.
- Discuss the ability of each unit process to meet existing flows and loads including the annexation area will be discussed for each phase. A process model will not be developed but flows and loads will be compared to typical loading rates for similar facilities based on industry standards and vendor-supplied information. Provide a recommendation as to whether future phases of the WWTF Master Plan should be implemented to address increased flows and loading.
- Provide master-planning level cost opinion for proposed improvements, using unit costs escalated from the previous WWTF Master Plan or other planning documents.

NCSD-58 (cont'd)

2.0 WATER SYSTEM

2.1 Water Supply and Demand

Water Supply

Historically, the District has relied heavily on pumped groundwater from the Nipomo Mesa Management Area (NMMA), a subbasin within the Santa Maria Groundwater Basin. The NMMA Technical Group, which is the court-assigned entity responsible for managing groundwater within the NMMA, has declared a Stage IV water severity condition for the subbasin. This condition requires purveyors reduce groundwater deliveries to 50% of the average production recorded between years 2009 and 2013. This results in a voluntary groundwater reduction goal of 1,267 AFY of pumped groundwater for the District.

Groundwater was the sole source of the District's water supply until 2015, when the District began importing water from the City of Santa Maria (City) as part of the Nipomo Supplemental Water Project (NSWP), dictated by the Final Judgment. The District executed the Wholesale Water Supply Agreement (Wholesale Agreement) with the City on May 7, 2013. Supplemental Water consists of a "municipal mix" of both surface water from the State Water Project and groundwater from the City of Santa Maria. The Wholesale Agreement requires a minimum water delivery to the District of 2,500 AFY by the 2025-26 fiscal year, a readily available amount of 500 AFY, and a maximum allowable delivery of 6,200 AFY. Due to a current Santa Barbara County license agreement limitation, this report focuses on the minimum delivery of 2,500 and the readily available 500 AFY totaling 3,000 AFY.

In addition to the Wholesale Agreement, a Water Replenishment Agreement requires water delivery to Woodlands Mutual Water Company (WMWC), Golden State Water Company (GSWC), and Golden State Water Company Cypress Ridge (GSWCCR). Table 2-1 outlines the required Wholesale Agreement water delivery schedule.

NCSD-58 (cont'd)

Table 2-1: Wholesale Water Agreement Delivery Schedule

AFY	Effective Delivery Date
1,000	7/1/2020
2,500	7/1/2025
3,000	Planning Capacity
6,200	Maximum Capacity

While the District is obligated to meet the minimum delivery schedule from the Wholesale Agreement, the District still has to maintain and operate groundwater wells to meet additional demands that the NSWP cannot meet, and to comply with State regulations. **Table 2-1** outlines the required Wholesale Agreement water delivery schedule.

Table 2-2 depicts the total supply available to the District including delivered water from the NSWP based on the above delivery schedule and maximum groundwater allocation as required by the Final Judgment.

Table 2-2: Total District Water Supply	
Source	**Water Supply**
	AFY
NCSD Groundwater Available[1]	1,267
NSWP Allocation	2,500
Total Future Water Supply	3,767
NSWP New Development Allocation[2]	500
Maximum Future Water Supply[3]	4,267

Notes:
1. NCSD's current voluntary groundwater reduction goal based on fifty percent reduction from average production in the FY's 2009-10 through 2013-14 as required by the Final Judgment, or fifty percent of 2,533 AFY based on Stage 4.
2. While this additional allocation is available to the District for delivery under the Wholesale Agreement, it should only be taken as needed. After the District requests 3,001 AFY, the District must maintain that delivery. It is believed the District may not have enough demand to warrant additional water delivery past 2,500 AFY in the planning horizon contemplated in this report.
3. Table 7-4, NMMA Stage 4, 2020 UWMP.

2.1.1. Water Demand Projections

Existing 2020 water demands for the District are summarized in **Table 2-3** based on calendar year 2020 usage as reported in the annual water usage report submitted to DWR and the 2020 UWMP update.

NCSD-58 (cont'd)

Table 2-3 : Existing District Demands (2020)		
Use Type	**2020 Actual**	
	Level of Treatment When Delivered	**Volume (AF)**
Single Family	Drinking Water	1,326
Multi-Family	Drinking Water	122
Commercial	Drinking Water	76
Landscape	Drinking Water	271
Other	Drinking Water	4
Agricultural Irrigation	Drinking Water	12
Losses	Drinking Water	237
	TOTAL (AF)	**2,048**

Notes:
1. Demands = Annual water consumption by customer type as shown above.
2. Values represent use as reported to DWR for 2020.

Projections under future conditions were developed in the 2020 UWMP and are summarized in **Table 2-4**. Future demand conditions included water service to parcels within the existing service area that are not currently served. This included parcels with Reserved District Capacity allocation (parcels not currently on the District's system but have potential to be added to the system), parcels served by private wells, vacant parcels, and ADUs associated with that growth. Criteria used in this analysis for subdivision and/or adding an ADU are listed below:

1. District's GIS parcel mapping data was used to identify existing land use designation and acreage information.
2. Existing and vacant residential single family (RSF) parcels greater than 12,000 square foot (sf) and served by a community sewer are allowed by ordinance to subdivide into 6,000 sf lots.
3. Existing and vacant residential single family (RSF) parcels on septic have a 1.0-acre minimum lot size requirement.
4. Existing and vacant residential suburban (RS) parcels greater than 2.0 acres are allowed by ordinance to subdivide to 1.0 acre lots.
5. Existing and vacant residential rural (RR) parcels greater than 10.0 acres are allowed by ordinance to subdivide to 5.0 acre lots.
6. Blacklake Village residential parcels have ADU capability (based on Proposed Amendments to Title 22).
7. Residential Multi-Family (RMF) parcels do not have ADU capability, regardless of parcel size.
8. Land uses that allow ADU dwellings include the following:
    a. Commercial, Retail (CR)
    b. Office and Professional (OP)
    c. Recreation (REC)
    d. Residential, Rural (RR)
    e. Residential, Suburban (RS)
    f. Residential, Single Family (RSF)

This "Maximum Anticipated Infill Development" scenario assumes that every parcel that has the capability to subdivide based on the above criteria will subdivide. This does not affect the potential future demand for existing customers because neither the total area of the parcel nor the usage factor changes. This increase in subdivision does increase the total number of parcels available to add an ADU. It is assumed every new parcel able to add an ADU will do so. Total ADU demand is projected by multiplying all eligible parcels by a demand factor of 0.11 AFY/ADU. The "Maximum Anticipated Infill Development" scenario is a conservative approach, but is appropriate to assess future worst case scenario needs since the District does not control land use or zoning within its service area.

NCSD-58 (cont'd)

This scenario also includes current District water demand, as well as the required deliveries to the Woodlands Mutual Water Company (WMWC), Golden State Water Company (GSWC), and Golden State Water Company Cypress Ridge (GSWCCR) according to the Water Replenishment Agreement, and shown in **Table 2-4** below.

Table 2-4: NCSD Potential Future System Demands (Maximum Anticipated Infill Development)	
Description	**Water Demand AFY**
Current NCSD Customer Usage	
Existing District Customers[1]	2,048
Potential District Maximum Anticipated Infill	
Future Demand	340
Future Demand Subtotal[2]	**2,388**
District Interconnections	
WMWC	417
GSWC	208
GSWCCR	208
Interconnection Subtotal	**833**
Total Future Demand with Interconnections (AFY)[2]	**3,221**

Notes:
1. Table 4-1, 2020 UWMP.
2. Table 4-3, 2020 UWMP. Total District projected water demand for year 2045, excluding anticipated demand from the proposed Dana Reserve development.

2.1.2. Dana Reserve Water Demand Projections

NCSD-58 (cont'd)

The proposed Dana Reserve development includes approximately 1,270 residential units, 18.9 acres of commercial land use, and 37.8 acres of public parks and streetscapes. Applying usage factors derived from the 2016 NCSD Urban Water Management Plan (UWMP) and additional factors pulled from the City of Santa Barbara and the County of SLO, the Developer estimated a total water demand for the new development of 370 acre-ft/year (AFY). This estimate includes a 10% contingency to account for additional miscellaneous water use. **Table 2-5** shows the developer's water use factors used and total demand projections for the Dana Reserve development as outlined in the most recent Water Supply Assessment update by RRM Design Group (2020) as cited below. The water demands projected by the developer are different from water demands projected using the District's methodology, as discussed below. Therefore, the District's water demand projections were used in this Evaluation.

Table 2-5: Developer Provided Water Use Factor and Demand Projections (Table 5.1 from DRSP Update)				
Land Use Category	**Number of Units or Acres**	**Water Use Factor[3] (AFY)**	**Potable Water Demand (AFY)**	**Daily Demand[2] (gpd)**
Residential				
Condos	173 units	0.13 AFY/unit	22.14	-
Townhomes	210 units	0.14 AFY/unit	30.24	-
Cluster	124 units	0.21 AFY/unit	25.79	-
4,000-5,999 SF	463 units	0.21 AFY/unit	96.30	-
6,000-7,000+ SF	225 units	0.34 AFY/unit	75.61	-
Affordable	75 units	0.14 AFY/unit	10.84	-
Subtotal	*1270 units*		*261.13*	*232,900*
Commercial[1]				
Village Commercial	4.4 ac	0.17 AFY/1,000 sf	8.69	-
Flex Commercial	14.5 ac	0.17 AFY/1,000 sf	28.63	-
Subtotal	*18.9 ac*		*37.32*	*33,319*
Landscape				
Village and Commercial Area[4]	6.3 ac	1.0 AFY/ac	6.30	-
Public Recreation	10.0 ac	1.0 AFY/ac	10.00	-
Neighborhood Parks	15.0 ac	1.0 AFY/ac	15.00	-
Streetscape/Parkways	6.5 ac	1.0 AFY/ac	6.50	-
Subtotal	*37.8 ac*		*37.80*	*28,121*
		Project Total	*336.25 AFY*	*300,185 gpd*
		Project Total (with 10% contingency)	*369.88 AFY*	*330,207 gpd*

Notes:
1. Assumes 0.15 gpd/sf and 33% useable site area for buildings.
2. Conversion factor: 1 AFY equals 892.742 gpd.
3. Water usage factors used by the developer in the table above are derived from the following sources: 2016 NCSD UWMP, the City of Santa Barbara and the County of San Luis Obispo.
4. Assumed 33% of the total commercial acreage is available for landscape.
5. Updated Table 5.1 provided in email dated September 23, 2020, from Robert Camacho, RRM Design Group

NCSD-58 (cont'd)

The water demand factors provided by the developer were compared to the standard water demand factors from the 2007 Water Master Plan referenced in the District Water and Wastewater Standards as well as calculated demand factors based on the 5-year and 10-year District average annual water production. This comparison is shown below in **Table 2-6**. The land use categories used by the developer (RRM) do not line up with categories that the District has outlined in the 2007 Water Master Plan (WMP) or within the District's current water model. As such, the District land use factors were applied to the most appropriate Dana Reserve land use category.

Table 2-6: Dana Reserve Water Demand Factor Comparison				
Land Use Category	**Dana Reserve Water Supply Assessment[1] (AFY/acre)**	**2007 Water Master Plan (AFY/acre)**	**5-Year Production Average (2016-2020 – AFY/acre)**	**10-Year Production Average (2011-2020 – AFY/acre)**
Condominiums	2.29	3.75	2.22	2.47
Townhomes	2.60	3.75	2.22	2.47
Small Lots SFR[2]	1.27	2.10	1.26	1.40
Medium Lot SFR	1.42	2.10	1.26	1.40
Affordable	2.71	3.75	2.22	2.47
Commercial	1.96	1.42	1.33	1.49
Parks/Streetscapes	1.00	0.98	0.71	0.79

Notes:
1. Developer originally used residential demand factors in the form of GPD/unit to calculate anticipated demand for residential development. Using information provided in the Dana Reserve Water Supply Assessment describing total areas for each land use category, average demand factors in the form of AFY/acre were calculated by MKN.
2. Small Lot SFR (Single Family Residence) includes "Cluster" Land Use Category shown in **Table 2-2**.

These demand factors were used to calculate average day demand, maximum day demand (MDD), and peak hour demand (PHD) for the Dana Reserve development. MDD and PHD were calculated by multiplying the average day demand by peaking factors of 1.7 and 3.78 (according to current District Standard Specifications) respectively. Each of the District projections include a 10% contingency to account for miscellaneous demand and total demands are outlined below in **Table 2-7**. We recommend using the projection calculated based on the 10-year production average, because it represents a range of years including both drought and non-drought conditions. While this is a conservative approach, it is an appropriate baseline for planning to meet future water demands. This is also the approach applied to potential annexations in the 2020 UWMP.

NCSD-58 (cont'd)

Table 2-7: NCSD Dana Reserve Water Demand Comparison				
Projection Method	**Average Day Flow[1] (AFY)**	**Average Day Flow (MGD)**	**Maximum Day Flow (MGD)**	**Peak Hour Flow (MGD)**
Peaking Factor	-		*1.7 x ADD*	*3.78 x ADD*
Water Supply Assessment (RRM)	358	0.32	0.54	1.21
2007 Water Master Plan Demand Factors	512	0.46	0.78	1.73
10-year Production Average Demand Factors (as applied in 2020 UWMP)	352	0.31	0.53	1.19
5-year Production Average Demand Factors	316	0.28	0.48	1.07

1. All average day demand values include a 10% contingency per the method used in the Water Supply Assessment.

Total demands for existing and future conditions within the District system, including anticipated demands from the Dana Reserve development, were compared with the future delivery capacity from the Nipomo Supplemental Water Project and groundwater allocation in **Table 2-8**.

Table 2-8: Water Supply Allocation and Demand		
Source	**Existing Conditions with Deliveries to Purveyors**	**Maximum Anticipated Infill Development**
	AFY	**AFY**
Average District Demand[1]	2,048	2,048
Potential District Maximum Anticipated Infill	-	340
Dana Reserve Demand	352	352
WMWC Demand[2]	417	417
GSWC Demand[2]	208	208
GSWCCR Demand[2]	208	208
Total Demand	**3,233**	**3,573**
2025 NSWP Allocation	2,500	2,500
NCSD Voluntary Groundwater Reduction Goal[3]	1,267	1,267
Total Future Water Supply	**3,767**	**3,767**
Supply Surplus / (Deficit)	**534**	**194**
NSWP New Development Allocation[4]	500	500
Maximum Future Water Supply	**4,267**	**4,267**

Notes:
1. Table 4-1, 2020 UWMP.
2. 2025 purveyor wholesale estimate, Table 4-3, 2020 UWMP
3. NCSD current voluntary groundwater reduction goal based on fifty percent reduction from average production in the FY's 2009-10 through 2013-14 as required by the Final Judgment, or fifty percent of 2,533 AFY.
4. While this additional allocation is available to the District for delivery under the Wholesale Agreement, it should only be taken as a last resort. After the District requests 3000 AFY, the District must maintain that delivery. It is believed the District does not have enough demand to warrant additional water delivery past 2500 AFY.

NCSD-58 (cont'd)

This analysis estimates that in 2025, even with the Dana Reserve Project, District water supplies will exceed demand by 534 AFY under existing conditions (with delivery to purveyors) and by 194 AFY under the Maximum Anticipated Infill Development scenario. If the District elects to take the New Development Allocation of 500 AFY, the remaining supply surplus will increase. A considerable challenge facing the District will be maintaining the currently operating wells within the system while continuing to meet contractual obligations for NSWP water deliveries. This is addressed in the storage discussion in Section 2.4.

2.2 Water System Facilities

2.2.1. Existing Facilities

The District's existing water system includes the following supply, storage, and distribution facilities:

Supply

- Nipomo Supplemental Water Supply: Joshua Road Pump Station currently operating between 550 and 820 GPM with capacity to operate at 1,860 GPM (3,000 AFY).
- Sundale Well: Currently operating at 890 GPM.
- Via Concha Well: Currently operating at 610 GPM.
- Black Lake Well #4: Currently operating at 360 GPM.
- Knollwood Well: Currently operating at 240 GPM.
- Eureka Well #2: Currently inoperable. Future design capacity of 1000 GPM (To be online by 2022).

Storage

- Foothill Tanks: 4 tanks totaling 3,000,000 gallons of useful storage.
- Standpipe: 280,000 gallons of useful storage.
- Joshua Road Tank: 500,000 gallons; No useful storage for District system since it is a partially-buried tank intended primarily as operational buffer for Joshua Road Pump Station. Flow from the Tank must be pumped into the District system.

Distribution

- Pipeline Statistics:

NCSD-58 (cont'd)

The following table summarizes pipe lengths in the distribution system as extracted from District's Water System GIS. The majority of pipelines (67%) are 8-inch diameter and smaller.

Table 2-9: Existing Water Pipeline Statistics

Pipe Diameter (inches)	Pipe Length (feet)	% of Total
2	120	0.02%
4	1,189	0.24%
6	121,722	24.18%
8	215,531	42.82%
10	81,703	16.23%
12	48,052	9.55%
14	1,265	0.25%
16	22,746	4.52%
18	101	0.02%
24	10,898	2.17%
Total	**503,327**	**100%**

2.2.2. Proposed Master Plan Facilities

MKN reviewed the District's 2007 Water and Sewer Master Plan (Master Plan) for potential proposed improvements that may be necessary to support the development. Of the proposed improvements, the following were identified:

- 12" pipeline along Northeastern length of proposed Dana Reserve development from the corner of Sandydale Drive and North Frontage Road to Willow Road to loop the water system.
- 16" pipeline from the Foothill Tanks to Sandydale Drive and North Frontage Road. The pipeline was reduced from the 24" diameter originally proposed in the WMP. A 16" pipeline is more appropriate given the updated future demands and flows necessary to meet District demand as a result of future development and the Dana Reserve Project.

As an alternative, District staff recommended MKN evaluate a 16-inch pipeline on North Oakglen Avenue from West Tefft Street to Sandydale Drive and North Frontage Road.

2.3 Hydraulic Analysis Results and Recommendations

2.3.1. Hydraulic Modeling Analysis

MKN utilized the District's current WaterCAD hydraulic model to evaluate the impact of the proposed Dana Reserve development on the existing and future District water system based on existing and future projected demands.

For the purpose of this report, scenarios were modeled for both current and future conditions within the District's Water System. All scenarios assumed delivery to the Woodlands Mutual Water Company (WMWC), Golden State Water Company (GSWC), and Golden State Water Company Cypress Ridge (GSWCCR) as outlined in **Table 2-4**. The existing conditions scenarios also assumed a delivery of 1,336 gpm (2,157 AFY) from the NSWP at the Joshua Road Pump Station (JRPS), which is based on the District's current delivery from JRPS (820 gpm) plus future required deliveries to other purveyors (516 gpm total). Model runs were performed under steady state conditions based on the following model settings:

NCSD-58 (cont'd)

- Existing System Demands
  - Average day demand (ADD) conditions: 1850 gpm
  - Maximum day demand (MDD) conditions: 2,784 gpm (1.7 peaking factor)
  - Peak hour demand (PHD) conditions: 5,559 gpm (3.78 peaking factor)
  - Residential fire-flow: 1,000 gpm per 2016 California Fire Code
  - Commercial fire-flow: 3,000 gpm
- Delivery to WMWC at Trail View Place: 258 gpm (417 AFY)
- Delivery to GSWC at Primavera Lane: 129 gpm (208 AFY)
- Delivery to GSWCCR at Lyn Road: 129 gpm (208 AFY)
- Joshua Road Pump Station at 1336 gpm (2157 AFY)
- Available Well Production
  - Blacklake #4: 360 gpm
  - Knollwood: 240 gpm

- Sundale: 890 gpm
- Via Concha: 610 gpm

- Foothill Tanks in service
  - Tank level during ADD: 17 feet (540 feet)
  - Tank level during MDD: 15 feet (538 feet)
  - Tank level during PHD: 13 feet (536 feet)
- Standpipe in service
  - Tank level during ADD: 80.4 feet (540 feet)
  - Tank level during MDD: 78.4 (538 feet)
  - Tank level during PHD: 76.4 (536 feet)

The scenarios were assessed based on the following criteria, in conjunction with current District Standards and Specifications for Water System Design:

- System Pressure
  - Minimum Operating Pressure (ADD, MDD, PHD) = 40 psi
  - Minimum Operating Pressure (MDD plus fire-flow) = 20 psi
  - Maximum Recommended Operating Pressure (All conditions) = 80 psi
- Pipeline Velocity
  - Maximum Pipeline Velocity (All conditions – as a goal not a requirement) = 5 ft/s

Table 2-10 provides a description of Scenarios 1 through 9 and results of the analysis for baseline conditions as well as existing conditions with the addition of the proposed Dana Reserve Development. Modeled system pressures were observed at the following nine locations within the District's water distribution system to identify pressure impacts to the District's low pressure service area customers, high pressure service area customers, interconnection with WMWC, interconnection with GSWC, interconnection with GSWCCR, and four locations within the Dana Reserve development:

NCSD-58 (cont'd)

- Low Pressure (high elevation) Area in Summit Station: Futura Lane
- High Pressure (low elevation) Area in Main Zone: Honeygrove Lane
- WMWC Interconnection: Trail View Place
- GSWC Interconnection: Primavera Lane
- GSWCCR Interconnection: Lyn Road west of Red Oak Way
- Dana Reserve Connection: Sandydale Drive
- Dana Reserve Connection: Pomeroy Road
- Dana Reserve Connection: Willow Road (west)
- Dana Reserve Connection: Willow Road (east)

Table 2-10: Hydraulic Modeling Results with NSWP Delivery at 2157 AFY

WaterCAD Scenario and Settings								Futura Lane (EL = 454')	Honeygrove Lane (EL = 306')	Dana Reserve at Sandydale Drive (EL = 355')	Dana Reserve at Pomeroy Road (EL = 351')	Dana Reserve at Willow Road 1 (EL = 385')	Dana Reserve at Willow Road 2 (EL = 378')	WMCC Interconnect at Trail View Place (EL = 222')	GSWC Interconnect at Primavera Lane (EL = 312')	GSWCCR Interconnect at Lyn Road (EL = 328')
Scenario	Description	Total Demand (GPM)	NSWP Delivery (GPM)	Wells	Quad Tanks Level (Feet)	Standpipe Level (Feet)	Dana Reserve Delivery Flow (GPM)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)	Pressure (PSI)
Baseline System Conditions without Delivery to Dana Reserve																
1	Average Day Demand	1850	1336	Off	17	80.4	-	37	102	80	81	-	-	137	99	91
2	Maximum Day Demand	2784	1336	Off	15	78.4	-	37	101	79	81	-	-	136	98	91
3	Maximum Day Demand + 1000 GPM Fire-flow at Futura Lane	3784	1336	Off	15	78.4	-	19.9	101	79	80	-	-	136	98	80
4	Peak Hour Demand	5559	1336	Off	13	76.4	-	36	93	72	73	-	-	129	91	90
System Conditions with Delivery to Dana Reserve																
5	Average Day Demand	2069	1336	Off	17	80.4	218	37	102	80	81	67	70	137	99	91
6	Maximum Day Demand	3155	1336	Off	15	78.4	371	36	99	78	79	65	68	135	97	90
7	Maximum Day Demand + 1000 GPM Fire-flow at Futura Lane	4155	1336	Off	15	78.4	371	19	99	78	79	65	67	135	97	79
8	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6155	1336	Off	15	78.4	3371	35	92	68	70	54	57	127	90	89
9	Peak Hour Demand	6383	1336	Off	13	76.4	824	34	89	56	58	68	70	125	87	88

Legend:
Falls within recommended range
Falls under recommended pressure (40 psi for ADD, MDD, PHD; 20 psi for Fire-flow)
Exceeds recommended pressure (80 psi for all scenarios)

NCSD-58
(cont'd)

Scenarios 1 through 4: Existing System Conditions

Scenarios 1-4 modeled existing pressures at the nine monitoring locations with NSWP delivery at 820 gpm, all storage tanks in service, and no wells in service under ADD, MDD, MDD plus fire-flow, and PHD conditions. Pressures throughout the water system under existing conditions vary slightly between ADD, MDD, MDD plus fire-flow, and PHD, but largely remain within the District's recommended pressure ranges. The District's high point, Futura Lane, faces pressures below the District's recommended range during all existing system condition scenarios. All purveyor interconnection sites experience high pressures (above 80 psi) throughout most existing system condition scenarios.

Scenarios 5 through 9: Existing System Conditions with Dana Reserve Addition

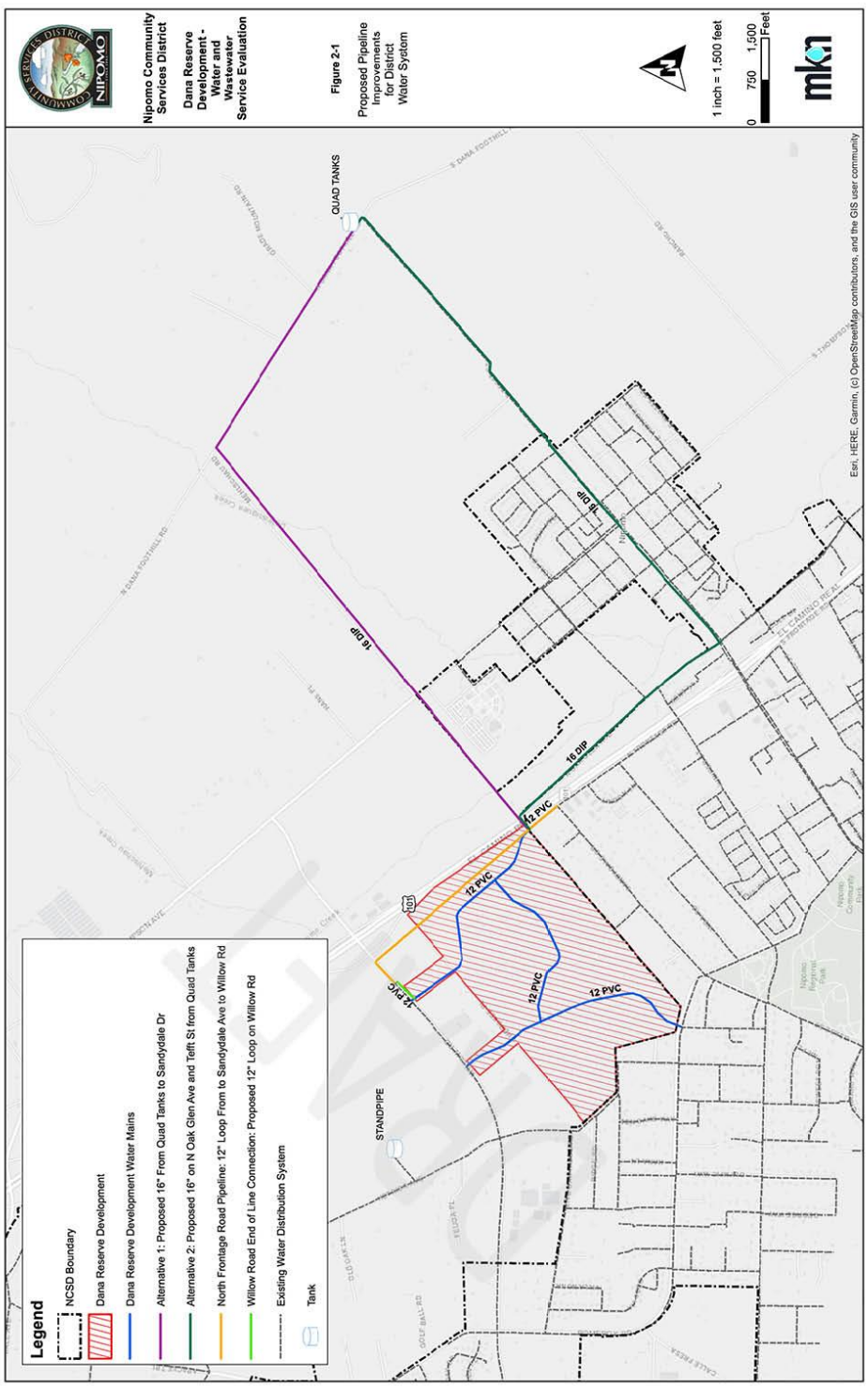
Results from Scenarios 5 through 9 show a minor decrease in system pressures (1-2 psi) during MDD plus fire-flow and PHD conditions across much of the system when compared to those same scenarios during existing conditions.

Figure 2-1 outlines the developer proposed water mains as well as four proposed improvement alternatives to mitigate the system impact made by the Dana Reserve Development. The impacts these alternatives have on the District's system in conjunction with increased future system demands were assessed in the hydraulic modeling analysis and are included in **Table 2-11** and the discussion to follow.

Table 2-11 summarizes Scenarios 10 through 23 and results of the analysis for future demands based on maximum anticipated infill development and increased NSWP delivery. These scenarios also included potential improvement projects in the analysis. The same assumptions were used as stated previously except for the following:

- Future System Demands
  - Average day demand (ADD) conditions: 2,277 gpm
  - Maximum day demand (MDD) conditions: 3,509 gpm (1.7 peaking factor)
  - Peak hour demand (PHD) conditions: 7,170 gpm (3.78 peaking factor)
- Joshua Road Pump Station at 1,550 gpm (2,500 AFY)

NCSD-58 (cont'd)



NCSD-58
(cont'd)

Table 2-11: Dana Reserve Hydraulic Modeling Results with NSWP Delivery at 2500 AFY

Scenario	WaterCAD Scenario and Settings: Description	Total Demand (GPM)	NSWP Delivery (GPM)	Wells	Quad Tanks Level (Feet)	Standpipe Level (Feet)	Dana Reserve Delivery: Flow (GPM)	Futura Lane (EL = 454') Pressure (PSI)	Honeygrove Lane (EL = 306') Pressure (PSI)	Dana Reserve at Sandydale Drive (EL = 355') Pressure (PSI)	Dana Reserve at Pomeroy Road (EL = 351') Pressure (PSI)	Dana Reserve at Willow Road 1 (EL = 385') Pressure (PSI)	Dana Reserve at Willow Road 2 (EL = 378') Pressure (PSI)	WMCC Interconnect at Trail View Place (EL = 222') Pressure (PSI)	GSWC Interconnect at Primavera Lane (EL = 312') Pressure (PSI)	GSWCCR Interconnect at Lyn Road (EL = 328') Pressure (PSI)
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential															
10	Average Day Demand	2277	1550	Off	17	80.4	199	37	102	80	81	67	70	137	102	91
11	Maximum Day Demand	3509	1550	Off	15	78.4	339	36	101	78	80	65	68	136	99	90
12	Maximum Day Demand + 1000 GPM Fire-flow at Futura Lane	4509	1550	Off	15	78.4	339	19	101	78	80	65	68	135	98	79
13	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	92	68	70	54	57	126	90	89
14	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve & NO JRPS	6509	0	Off	15	78.4	3339	34	85	63	65	50	53	122	83	89
15	Peak Hour Demand	7170	1550	Off	13	76.4	754	33	92	70	72	58	60	127	90	87
16	Peak Hour Demand	7170	1550	All Wells On	13	76.4	754	34	97	76	78	63	66	137	95	88
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential with Proposed 16" Pipeline From Quad Tanks															
17	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	97	73	75	59	62	131	95	89
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential with Proposed 16" Pipeline on N Oak Glen and Tefft															
18	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	95	73	74	58	62	130	93	89
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential without 10" Pipeline from Quad Tanks on Tefft															
19	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	93	68	70	54	57	127	90	89
20	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve & NO JRPS	6509	0	Off	15	78.4	3339	34	80	59	61	45	48	117	78	88
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential with Proposed 12" Loop on North Frontage from Sandydale to Willow															
21	Maximum Day Demand + 1000 GPM Fire-flow at Futura Lane	4509	1550	Off	15	78.4	339	19	101	78	80	65	68	135	98	79
22	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	95	70	72	56	59	128	93	89
23	Peak Hour Demand	7170	1550	Off	13	76.4	754	33	92	70	72	58	60	127	90	87
	System Conditions with Delivery to Dana Reserve and Future Flows Based on Subdivision Potential with Proposed 12" End-of-Line Loop on Willow															
24	Maximum Day Demand + 3000 GPM Fire-flow at Dana Reserve	6509	1550	Off	15	78.4	3339	35	92	68	70	54	57	126	90	89

Legend:
Falls within recommended range
Falls under recommended pressure (40 psi for ADD, MDD, PHD; 20 psi for Fire-flow)
Exceeds recommended pressure (80 psi for all scenarios)

NCSD-58
(cont'd)

Scenarios 10 through 16: Future System Conditions with Dana Reserve Addition

System pressures at the monitoring locations increased by 1-2 psi for flow conditions with the higher demands and NSWP delivery (3000 AFY) compared to existing system conditions. Futura Lane remains consistently below allowable system pressures for all conditions except MDD plus fire-flow at Dana Reserve, which is consistent with the existing conditions scenarios. It should be noted that the worst-case scenario run, MDD plus fire-flow conditions at Dana Reserve (3000 gpm) with JRPS not operating, still yielded acceptable pressures at all monitored nodes.

Scenario 17: Future System Conditions with Dana Reserve Addition and Proposed Alternative 1

Alternative 1 includes a 16" pipeline from the Foothill Tanks to the connection point at Dana Reserve as shown in **Figure 2-1**. This scenario was performed assuming MDD plus fire-flow conditions at Dana Reserve (3000 gpm) and improves system pressures by 2-3 psi at all nodes except for Futura Lane and the GSWCCR Interconnection. This improvement was modified from the original 24" Master Plan improvement recommended to account for low pipeline velocities.

Scenario 18: Future System Conditions with Dana Reserve Addition and Proposed Alternative 2

Alternative 2 includes a 16" pipeline on North Oak Glen Avenue from Tefft Street to the connection point at Dana Reserve, and the replacement of the 10" AC pipeline on Tefft with a new 16" ductile iron pipe as shown in **Figure 2-1**. This scenario was performed assuming MDD plus fire-flow conditions at Dana Reserve (3000 gpm) and the pipeline improves system pressures by 1-2 psi at the Dana Reserve site, but lowers system pressures by less than 1 psi at Honeygrove Lane (low elevation system location) and the WMCC Interconnection. It should be noted that both of those nodes are consistently above recommended system pressures for the District system, so lower pressures at these sites are of less concern.

Scenarios 19 through 20: Future System Conditions with Dana Reserve Addition and Without 10" Pipeline from Foothill Tanks on Tefft (Proposed Alternative 2)

NCSD-58 (cont'd)

These scenarios were run performed to demonstrate the degree to which the District relies on the 10" and 12" pipelines running from the Foothill Tanks to the rest of the District's distribution system. The 10" pipeline is asbestos cement and is over 50 years old (originally installed in 1966). These scenarios assumed MDD plus fire-flow at Dana Reserve (3000 gpm) condition and the same condition without JRPS online, to demonstrate the effects on the distribution system without NSWP delivery and with limited flow from the Foothill Tanks. The first scenario lowers system pressures by 1-3 psi across the system, and most significantly impacted the Dana Reserve development. This scenario increased the pipeline velocity in the parallel 12" pipeline coming from the Foothill Tanks, but not above the District's limit of 5 ft/s. Scenario 20 without JRPS online decreased system pressures by 10-15 psi when compared to Scenario 13 (Future System Conditions at MDD plus fire-flow at Dana Reserve). This scenario also increased the pipeline velocity in the parallel 12" pipeline coming from the Foothill Tanks to approximately 6.08 ft/s, exceeding the maximum recommended velocity outlined by the District Standards.

Scenarios 21 through 23: Future System Conditions with Dana Reserve Addition and North Frontage Road Pipeline

These scenarios analyze approximately 4750 LF of 12" pipeline along North Frontage Road to the existing dead-end on Willow Road as shown in **Figure 2-1**. Results from these scenarios indicate that this pipeline will not improve system pressures by a significant margin, however, this improvement promotes looping from the tanks to Dana Reserve which is an important benefit to eliminate dead end water mains and minimize water age throughout the system. The District requires looping of water mains to prevent dead ends.

Scenario 24: Future System Conditions with Dana Reserve Addition and Willow Road End-of-Line (EOL) Connection

This scenario includes a 12" loop on Willow Road to prevent a dead-end line on Willow Road as an alternative to the North Frontage Road Pipeline as shown in **Figure 2-1**. This alternative causes no change to system pressures shown in Scenario 13 (Future System Conditions at MDD plus fire-flow at Dana Reserve) but does satisfy District looping requirements with minimal off-site improvements.

2.3.2. Recommended Offsite Pipeline Improvements

The hydraulic analysis indicated that the Dana Reserve development will likely impact the District's water distribution system most significantly during MDD plus fire-flow at Dana Reserve and PHD conditions with minor decreases of less than 1 psi under other ADD and MDD conditions. The District should consider either Alternatives 1 or 2 to ensure reliable water delivery and adequate pressures throughout their system with the addition of the Dana Reserve Development.

1. Alternative 1: Construction of the new 16-inch pipeline (shown in Figure 2-1) from the Foothill Tanks to the Sandydale connection point would allow the District to maintain high system pressures during MDD plus fire-flow conditions at Dana Reserve and provide an additional freeway crossing, adding required redundancy to the existing distribution system.

2. Alternative 2: Construction of the new 16-inch pipeline on North Oak Glen Drive from Tefft Street to the Sandydale connection point; and replacement of the existing 10-inch AC pipeline from the Foothill Tanks to North Oak Glen Drive on Tefft Street with a new 16-inch PVC pipeline (shown in Figure 2-1). These improvements would allow the District to maintain high system pressures during MDD plus fire-flow conditions at Dana Reserve and provide an additional freeway crossing, adding required redundancy to the existing distribution system (shown in Figure 2-1). These improvements would also provide required redundancy to the District's water supply from the Foothill Tanks. The existing 10-inch is at high risk of failure because of the age of the pipeline. This pipeline also provides much of the system's water supply, and if it were to fail, pressures would fall across the system.

NCSD-58 (cont'd)

2.3.3. Evaluation of Proposed Onsite Pipeline Improvements

The Developer proposed four connection points for the Dana Reserve water system based on anticipated projects. However one proposed connection does not connect to the District's existing system. As such, it is recommended that the southeast connection point be moved to the intersection of Sandydale Drive and North Frontage Road.

Figure 2-1 shows the Developer-proposed water mains for the Dana Reserve development per the most recent copy of the Draft DRSP (April 2020). The proposed 12-inch mains are appropriate for maintaining District recommended pressures and velocities. **Figure 2-1** shows the North Frontage Road Pipeline that provides looping for the overall system and prevents a dead end on Willow Road. While looping is required to meet District standards, it is recommended the District pursue the Willow Road EOL Connection, outlined in **Figure 2-1**, to avoid a dead-end connection, while maintaining services at the end of the 12-inch line on Willow Road. This alternative maintains looping requirements but avoids unnecessary off-site improvements.

It should be noted that the Draft DRSP only identifies transmission mains to serve the Dana Reserve development, so the extent of onsite improvements that could be reviewed and modeled was limited. Further evaluation will be needed after preliminary design of onsite improvements is submitted by the developer.

2.4 Storage Analysis and Recommendations

Table 2-13 outlines the water system storage capacity for the District system under three scenarios, with and without the Dana Reserve Development. The first scenario represents existing conditions of the current District system based on current system demands and service population. The second scenario represents the maximum anticipated infill potential based on parcels that could be added to the District system, particularly those designated NCSD Reserved Capacity, those on private wells, and vacant parcels. This scenario assumes that those parcels that can subdivide will subdivide, increasing ADU potential. The final scenario represents the future conditions outlined in the Storage Capacity Analysis of the 2007 Water and Sewer Master Plan. This scenario anticipated the construction of 1,000,000 gallons of additional storage, increasing the overall system storage to a total of 4,280,000 gallons. The 2007 Water and Sewer Master Plan analysis also included Sundale Well as an emergency supply. It was assumed that Sundale Well could reliably produce 1,000 gpm of emergency water supply for a three-day period, which is equivalent to 3,710,000 gallons. This assumption is not valid if the wells are not operated sufficiently.

The District is required by State law (California Code of Regulations Title 22) to maintain sufficient water storage capacity within its system to meet three basic needs: fire storage, equalization storage, and emergency storage. Fire flow storage must be greater than that required to produce the maximum anticipated fire-flow for a specified duration. Equalization storage is necessary to maintain availability of demand during peak conditions when system demands are greater than that being fed directly from supply sources. Emergency storage must be on hand to produce at least 50 gallons per capita per day for three days.

Fire-flow storage is calculated by multiplying fire-fighting flowrate by the duration of the fire-fighting event. A 3,000 gallon per minute flowrate for a duration of three hours was used to determine the minimum fire storage required for the system (540,000 gallons). This minimum value was assumed to be equal for both existing and future conditions.

NCSD-58 (cont'd)

Equalization storage is estimated by the formula: (1.5 – 1) x (MDD in GPM) x (14 hours) x (60 minutes per hour). The calculated values are displayed in **Table 2-13** for three scenarios.

Emergency storage is calculated by multiplying population by 50 gallons per day for three days. Existing population within the NCSD service area is estimated at 13,771 for the year of 2020 as calculated using the Department of Water Resources (DWR) Population Tool. Existing and future population projections from the 2020 DWR service population estimates are shown in **Table 2-12,** including future projections from the 2020 UWMP.

Table 2-12: NCSD Served Population Summary

Conditions	2020 Population	2045 Population with Maximum Anticipated Infill Development
District Service Area	13,771	16,031
District Service Area with Dana Reserve Project	13,771	18,398

Notes:
1. Per Tables 3-1 and 3-1a from the District's 2020 UWMP update.

Table 2-13: Water System Storage Capacity			
Storage Requirements	**Existing Conditions[1]**	**Existing Conditions with Dana Reserve**	**Maximum Anticipated Infill Development[2] with Dana Reserve**
	gallons	**gallons**	**gallons**
Fire	540,000	540,000	540,000
Equalization	952,489	1,108,198	1,256,843
Emergency	2,065,650	2,486,250	2,550,600
Total	**3,558,139**	**4,134,448**	**4,347,443**
Existing Above-Ground Storage Capacity	3,280,000	3,280,000	3,280,000
Gross Surplus/(Deficiency)	(278,139)	(854,448)	(1,067,443)

Notes:
1. Existing conditions based on 2019 NCSD customer usage data.
2. Maximum anticipated infill development based on current land development status and potential future development status.

The District's existing tank storage is not adequate to meet current and future needs including the Dana Reserve. While current storage does not adequately provide storage for existing conditions, the addition of Dana Reserve increases the storage need by almost 577,000 gallons.

NCSD-58 (cont'd)

As delivery from the NSWP increases, the District will require more operational storage for the water distribution system. Unlike wells, which can be sequenced to match daily diurnal usage fluctuations, the NSWP delivers constant flow into the District system. This requires additional equalization or "buffer" storage to prevent overflowing tanks or draining them below typical operating levels. As the District continues to operate their existing groundwater wells, the District will operate them during times when the cost for energy is low, which typically falls during low water demand hours (late night to early morning). This increased production during low consumption periods will dictate the District's need for additional storage. It is recommended that the District invest in additional aboveground storage in order to maintain enough storage to improve flexibility in operating with higher NSWP deliveries alongside continued groundwater well pumping. The preferred location for new storage is at the Foothill Tanks site.

Adding the new 1.0 MG storage tank recommended in the Water Master Plan will require that the District purchase additional land. The expanded storage capacity will allow the District to meet the identified storage requirements and will provide required redundancy. The additional tank will also facilitate tank maintenance as cleaning and recoating can require taking a tank out of service for months at a time. The addition of a new tank at the Foothill Tanks site would necessitate improvements to the District's current chemical injection as well as valving between tanks. The current chemical injection system relies on manual injection of chemicals to the water stored in the elevated tanks. The construction of an additional storage tank would warrant automation and improvements to the existing chemical injection. It is also recommended that the District automate the current manual isolation valves between tanks to control water quality and manage constant flow from the NSWP.

Operational storage for NSWP delivery is another area of concern. The existing 500,000 gallon partially-buried reservoir at JRPS receives water from the City of Santa Maria. Pressure conditions in the City's system can fluctuate, necessitating the inclusion of this reservoir to provide a constant water supply to JRPS. The reservoir is

one of the only major components of NSWP with no redundancy. If the existing JRPS Reservoir is taken out of service for repairs, cleaning or maintenance, NSWP may not have adequate supply from the City to operate which could leave the District unable to meet system demands. Adding a second 500,000-gallon reservoir at JRPS is required to provide redundancy in case the reservoir must be taken out of service for maintenance or repairs.

NCSD-58
(cont'd)

DRAFT

3.0 WASTEWATER COLLECTION SYSTEM

3.1 Wastewater Flows

3.1.1. Flow Monitoring

To aid in estimating existing wastewater flows and the distribution across the District wastewater collection system, MKN's subconsultant, ADS, placed three (3) depth-velocity flow meters in the District's collection system at locations indicated on **Figure 3-1**. MKN and District staff worked with ADS to identify manholes for placement. Five-minute depth and velocity data were collected between October 23, 2020, and November 28, 2020 and converted to flow in gallons per minute (GPM). The report from ADS (Appendix A) describes the flow meter type and data collection methodology and provides graphs of calculated flows at each location.

The sewershed upstream of Flow Meter No. 1 (FM01) includes contributions from the two other flow meters (FM02 and FM03).

The flow conditions used throughout the next two sections of the Study are defined below.

- *Average Annual Flow (AAF):* The flow rate averaged over the course of the year and the base flow for the collection system and WWTF.
- *Average Daily Flow (ADF):* The flow rate averaged by day over a monitoring period.
- *Maximum Month Flow (MMF):* The average daily flow during the month with the maximum cumulative flow. MMF is often the basis for a WWTF permitted flow limit.
- *Peak Day Flow (PDF):* The maximum daily flow rate used to design or evaluate hydraulic retention times for certain wastewater treatment processes.
- *Peak Hour Flow (PHF):* The maximum one-hour flow experienced by the facility is typically used for sizing collection system mains, WWTF piping, pump stations, flow meters and WWTF headworks systems. Peak hour flow is typically derived from facility influent records, flow monitoring, or empirical equations used to estimate PHF based on service area population.

NCSD-58 (cont'd)

The following table summarizes results for each flow meter during the flow monitoring period.

Table 3-1: Summary of Flow Monitoring Results (Oct. 23 – Nov. 28, 2020)

		Flow Meter		
Parameter	**Units**	**FM01**	**FM02**	**FM03**
Pipe Diameter	Inches	24	12	10
Average Daily Flow	GPD	560,000	191,000	74,000
Average Daily Flow	GPM	389	133	52
Average Flow Depth	Inches	4.75	2.95	2.25
Peak Hour Flow	GPM	747	258	101
Peak Hour Flow Depth	Inches	5.08	3.00	2.32
Peak Hour Peaking Factor (PHF/ADF)	-	1.9	1.9	1.9
Peak Instantaneous Flow (5-minute data)	GPM	875	643	172

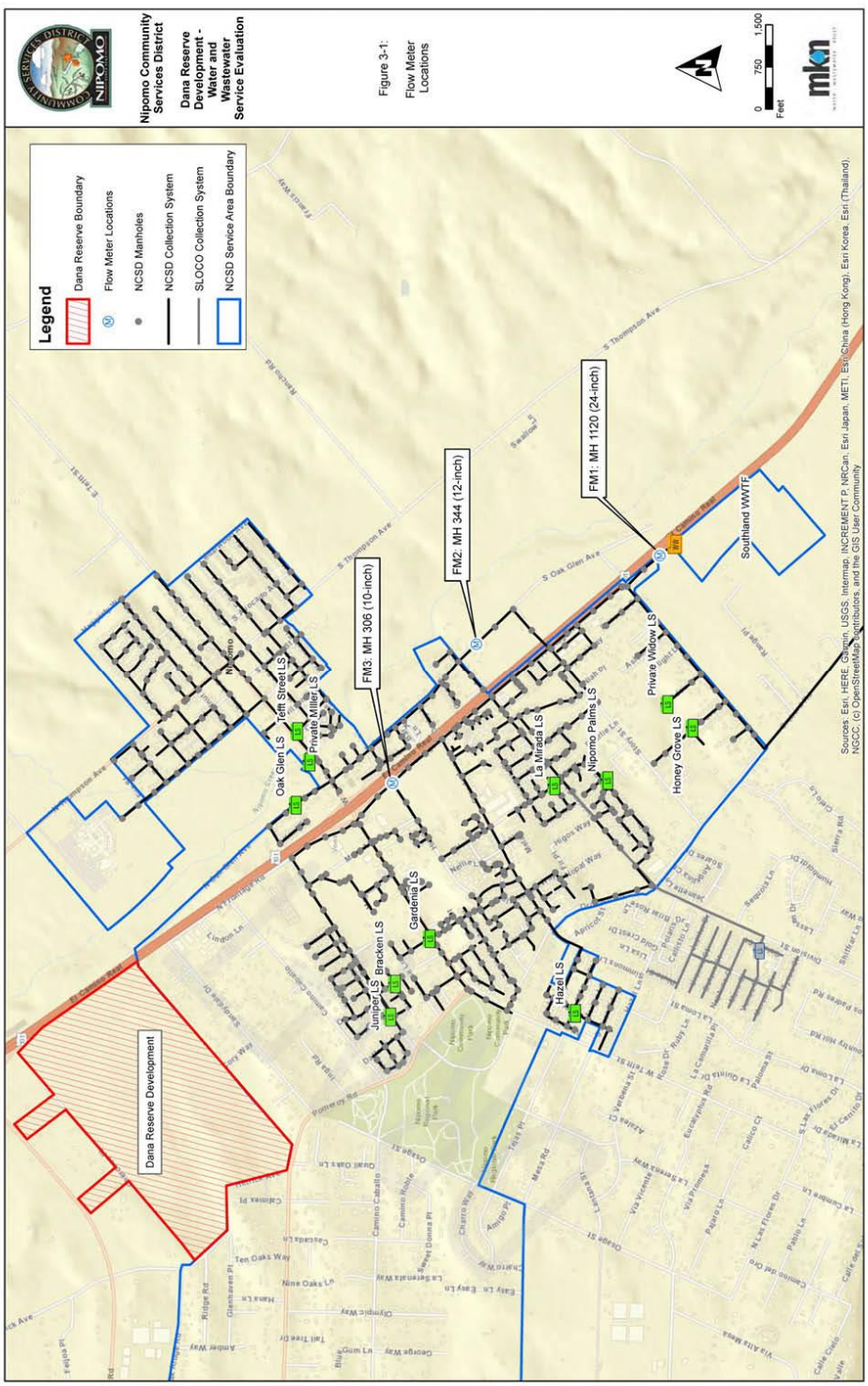
Results for FM01 during the study period were compared to flows at the Southland WWTF influent flow meter during the study period and between January 2019 and December 2020.

Table 3-2: Historical Southland WWTF Influent Flow and Loading (January 2019 – December 2020)

Parameter	Unit	Value
Average Flow During Study Period (Oct/Nov 2020)	MGD	0.50
Average Annual Flow (AAF)	MGD	0.49
Maximum Month Flow (MMF)	MGD	0.51
Peak Day Flow (PDF)	MGD	0.57
Peak Hour Flow (PHF)[1]	MGD	1.3

NCSD-58
(cont'd)

[1] Peak hour was determined from data collected between July 2018 and June 2020 for another study being conducted by the District.



NCSD-58
(cont'd)

3.1.2. District Projections

The District includes two wastewater service areas: Town and Blacklake. District staff is developing the Blacklake Sewer Consolidation Project to regionalize wastewater treatment at a central District facility. Existing influent wastewater from the Blacklake sewer collection system will be diverted from the Blacklake Water Reclamation Facility (WRF) to the Southland Wastewater Treatment Facility (WWTF). This project will require installation of a lift station at the existing Blacklake WRF site and construction of a force main to convey wastewater from the Blacklake system to the Town Sewer system for conveyance and treatment at the Southland WWTF. The existing Blacklake WRF will be decommissioned.

County sewer customers are also connected to the Town System through the Galaxy and People's Self Help (PSH) Lift Stations. These customers are identified separately in **Table 3-4**.

Future District projections in **Table 3-5** include both Blacklake and Town service areas since both will be served in the future. District GIS has identified parcels which are not yet tied into District sewer mains but could be served in the future, therefore these parcels were included. Two different methods were considered to estimate future AAF:

- Method 1: Return flows applied to 10-year (2011-2020) water production records[2].
- Method 2: Duty factors from the 2007 Water and Sewer Master Plan Update

Method 1 results were developed from average daily demand (ADD) calculated as described in Section 2.1 for the Maximum Anticipated Infill Development Scenario and potential ADUs with return factors applied based on land use of each parcel. Return factors are summarized in the table below.

Table 3-3: Sewer Flow Return Factors by Land Use

Land Use	Sewer Flow Return Factor (%)
Agriculture	-
Commercial Retail	90%
Commercial Service	90%
Multi-Land Use Category	90%
Office and Professional	90%
Open Space	65%
Public Facility	65%
Recreation	-
Rural Lands	-
Residential Multi-Family	90%
Residential Rural	90%
Residential Suburban	50%
Residential Single Family	60%

NCSD-58 (cont'd)

[2] Historical demands by parcel, based on billing records, were adjusted using the 10-year production average. These demands by individual parcel were then used to calculate water usage factors per acre based on land use category.

Both methods are summarized below for the entire Town Sewer service area, including the County service areas. Both methods are also compared to the flow metering results discussed in Section 3.1.

Table 3-4: Estimated Total Existing Sewer Flows

Land Use	No. of Sewered Parcels	Area (Ac)	% of Total	10-yr Water Production (gpd)	% of Total	Return Factor (%)	Estimated Sewer Flow based on Return Factors (gpd)	Estimated Sewer Flow with MP Sewer Factors (gpd)
Commercial Retail	3	57	7%	76,151	9%	90%	68,536	61,113
Commercial Service	9	8	1%	3,464	0%	90%	3,117	2,032
Multi-Land Use Category	1	3	0%	359	0%	90%	323	0
Office and Professional	18	5	1%	2,992	0%	90%	2,693	942
Public Facility	5	12	1%	4,186	0%	65%	2,721	5,188
Rural Lands	1	3	0%	268	0%	0%	0	0
Recreation	1	122	16%	86,473	10%	0%	0	0
Residential Multi-Family	525	72	9%	158,785	19%	90%	142,906	189,711
Residential Suburban	112	39	5%	21,382	3%	50%	10,691	12,817
Residential Single Family	1,878	384	49%	479,326	58%	60%	287,596	354,371
Agriculture	1	79	10%	40,938	0%	0%	0	0
Subtotal	**2,554**	**783**	**100%**	**874,325**	**100%**	**-**	**518,584**	**626,173**
						County Service Areas	72,662	77,074
						Total Estimated Flow	**591,246**	**703,247**
						Measured Flow	559,673	559,673
						% Difference	**6%**	**26%**

NCSD-58 (cont'd)

Table 3-5 summarizes future flow estimates under both methods described above.

Table 3-5: Projected Future Sewer Flows (Not including Existing)

Land Use	No. of Sewered Parcels	Area (Ac)	% of Total	10-Yr Water Production (gpd)	% of Total	Return Factor (%)	Estimated Sewer Flow with Return Factor (gpd)	Estimated Sewer Flow with MP Sewer Factors (gpd)
Commercial Retail	62	71	15%	94,133	21%	90%	84,720	75,544
Commercial Service	11	49	10%	21,883	5%	90%	19,695	12,838
Multi-Land Use Category	0	0	0%	0	0%	90%	0	0
Office and Professional	14	9	2%	5,576	1%	90%	5,018	1,755
Public Facility	2	12	2%	4,279	1%	65%	2,782	5,304
Rural Lands	0	0	0%	0	0%	0%	0	0
Recreation	0	0	0%	0	0%	0%	0	0
Residential Multi-Family	29	38	8%	83,775	13%	90%	75,398	100,092
Residential Suburban	91	132	28%	72,673	21%	50%	36,336	43,560
Residential Single Family	169	153	33%	191,222	37%	60%	114,733	141,372
Agriculture	0	0	0%	0	0%	0%	0	0
Subtotal	**378**	**464**	**100%**	**473,541**	**100%**	**-**	**338,681**	**380,465**
						Blacklake WRF[1]	58,000	58,000
						Future ADUs	26,161	26,161
						Total Flows	**422,842**	**464,626**

Notes:
1. Blacklake WRF will be decommissioned in the future with flows going to Southland WWTP instead. Future flow from the 2017 Blacklake Sewer Master Plan (MKN) was used.

NCSD-58 (cont'd)

Flow meter results were compared to estimated existing flows as shown in the following tables to calibrate the District's sewer model. Existing flows were estimated by applying the return factors to water billing records for each customer. The readings at FM01 and FM02, the largest sewersheds, were significantly closer to modeled AAF estimates than FM03 (3.4% and 0% compared to 28%). FM03 only represented 13% of the measured flow. Since the flow monitoring represented a limited period, but monthly flows at Southland WWTF do not vary significantly from AAF, the flow monitoring results indicate Method 1 and the assumed return factors are adequate for modeling sewer system flows in each sewershed.

Table 3-6: Estimated Sewer Flow for FM01 Basin							
Existing							
Land Use	**No. of Sewered Parcels**	**Area (Ac)**	**% of Total**	**Water Usage (gpd)**	**% of Total**	**Reduction Factor (%)**	**Estimated Sewer Flow (gpd)**
Commercial Retail	3	5	2%	6,533	2%	90%	5,879
Commercial Service	9	8	3%	3,463	1%	90%	3,117
Multi-Land Use Category	1	3	1%	359	0%	90%	323
Public Facility	1	0	0%	0	0%	65%	-
Rural Lands	1	3	1%	271	0%	0%	-
Residential Multi-Family	317	43	17%	95,760	29%	90%	86,184
Residential Suburban	86	35	13%	19,181	6%	50%	9,591
Residential Single Family	777	166	63%	206,869	62%	60%	124,122
Subtotal	**1,195**	**262**	**100%**	**332,437**	**100%**	--	**229,216**
						County Service Areas	72,662
Total							301,877
						FM01-(FM02+FM03) Measured Flow (gpd)	**294,355**
						% Difference	**3.4%**

Table 3-7: Estimated Sewer Flow for FM02							
Existing							
Land Use	**No. of Sewered Parcels**	**Area (Ac)**	**% of Total**	**Water Usage (gpd)**	**% of Total**	**Reduction Factor (%)**	**Estimated Sewer Flow (gpd)**
Commercial Retail	41	24	8%	31,648	12%	90%	28,484
Commercial Service	0	0	0%	0	0%	90%	0
Office and Professional	18	5	2%	2,993	1%	90%	2,693
Public Facility	4	12	4%	4,139	2%	65%	2,691
Residential Multi-Family	184	27	9%	59,391	22%	90%	53,452
Residential Suburban	26	4	1%	2,201	1%	50%	1,101
Residential Single Family	647	136	48%	170,477	63%	60%	102,286
Agriculture	1	79	28%	0	0%	0%	-
Total	**921**	**287**	**100%**	**270,850**	**100%**	--	**190,706**
						Measured Average Daily Flow (gpd)	**190,986**
						% Difference	**0.0%**

NCSD-58 (cont'd)

Table 3-8: Estimated Sewer Flow for FM03							
Existing							
Land Use	**No. of Sewered Parcels**	**Area (Ac)**	**% of Total**	**Water Usage (gpd)**	**% of Total**	**Reduction Factor (%)**	**Estimated Sewer Flow (gpd)**
Commercial Retail	24	29	12%	37,973	17%	90%	34,175
Office and Professional	0	0	0%	0	0%	90%	0
Public Facility	0	0	0%	0	0%	65%	0
Recreation	1	122	52%	86,473	38%	0%	-
Residential Multi-Family	24	2	1%	3,631	2%	90%	3,268
Residential Single Family	454	82	35%	101,986	44%	60%	61,192
Total	**503**	**234**	**100%**	**230,063**	**100%**	**--**	**98,635**
						Measured Average Daily Flow (gpd)	**74,332**
						% Difference	**28%**

Peaking factors for maximum month, peak day, and peak hour flow conditions were determined from historical flows at Southland WWTF between January 2019 and December 2020. Peak hour was determined from data collected between July 2018 and June 2020 for another study being conducted by the District. The following table summarizes these flows and the resulting peaking factors:

Table 3-9: Historical Southland WWTF Influent Flow			
Parameter	**Unit**	**Value**	**Calculated Peaking Factor (PF)**
AAF	MGD	0.50	--
MMF	MGD	0.51	1.02
PDF	MGD	0.57	1.14
PHF	MGD	1.3	2.6

NCSD-58 (cont'd)

3.1.3. Dana Reserve Wastewater Flow Projections

Approximate wastewater generation from the new development was calculated by the developers in the Dana Reserve Specific Plan totaling an average flow of 0.204 million gallons per day (MGD) and a Peak Hour Flow (assuming a peaking factor of 2.5) of 0.510 MGD. Residential wastewater generation factors were calculated as percentages of the average water demand, with single-family home parcels above 6000 square feet equaling 60% of the water demand, single-family home parcels between 4,000 to 6,000 square feet equaling 70%, and 90% for all other residential categories. Wastewater flow generation factors for commercial land uses were derived from the City of San Luis Obispo Infrastructure Renewal Strategy (Dec. 2015).

Table 3-10: Developer Provided Wastewater Generation Factor and Demand Projections (Table 5.2 from DRSP Update)				
Land Use Category	**Number of Units or Acres**	**Wastewater Generation Factor[3,4] (GPD)**	**Annual Demand (af/yr)**	**Daily Demand[2] (gpd)**
Residential				
Condos	173 units	103/unit	19.93	
Townhomes	210 units	116/unit	27.21	
Cluster	124 units	167/unit	23.21	
4,000-5,999 SF	463 units	130/unit	67.41	
6,000-7,000+ SF	225 units	180/unit	45.36	
Affordable	75 units	116/unit	9.72	
		Subtotal	*192.84[5]*	*172,245*
Commercial[1]				
Village Commercial	4.4 ac	100/k-sf	7.16	
Flex Commercial	14.5 ac	100/k-sf	23.58	
		Subtotal	*30.74*	*27,443*
Landscape				
Public Recreation	10.0 ac	0.50 af-ft/yr-acre	5.00	
Neighborhood Parks	15.0 ac	-	-	
Streetscape/Parkways	6.5 ac	-	-	
		Subtotal	*5.00*	*4,464*
		Project Total Average Day Flow:	*228.68 af/yr*	*204,152 gpd*
		Project Peak Flow (assumes 2.5 Peaking Factor):	*571.70 af/yr*	*510,381 gpd*

Notes:
1. Assumes 33% useable site area for buildings.
2. Conversion factor: 1 af/yr equals 892.742 gpd.
3. Wastewater flow generation factors for single family are a percentage of average water demand: 60% for 6,000+, 70% for 4,000-6,000, 90% for all others.
4. Wastewater flow generation factors for commercial: City of San Luis Obispo, Infrastructure Renewal Strategy (Dec. 2015).
5. Subtotal for Residential land use was identified as 192.94 in the draft table but calculated as 192.84.
6. Updated Table 5.2 provided in email dated September 23, 2020, from Robert Camacho, RRM Design Group.

NCSD-58 (cont'd)

In **Table 3-11**, flows estimated by the developer were compared to estimated wastewater flows developed using both methods (2007 Sewer Master Plan and water usage-based flow estimates) discussed in Section 3.1.2.

Table 3-11: Dana Reserve Wastewater Flow Projections using Water Production-Based and 2007 Sewer Master Plan-Based Methods							
Land Use	**Acres**	**10-Year Water Land-Use Factor (GPD/acre)**	**10-Year Water Production (GPD)**	**Sewer Flow Return Factor**	**Sewer Flow Rate Using Water Production and Return Factors (GPD)**	**2007 Sewer Master Plan Update Duty Factors (GPD/ acre)**	**Sewer Flow Rate Using District Duty Factors (GPD)**
Multi-Family	19.3	2205	42,557	90%	**38,301**	2,634	**50,836**
Cluster	16.2	2205	35,721	90%	**32,149**	2,634	**42,671**
4000 SF Lot	53.4	1250	66,750	60%	**40,050**	924	**49,342**
4800 SF Lot	26.7	1250	33,375	60%	**20,025**	924	**24,671**
6000 SF Lot	15.8	1250	19,750	60%	**11,850**	924	**14,599**
6000-7000 SF Lot	37.3	1250	46,625	60%	**27,975**	924	**34,465**
Affordable	4	2205	8,820	90%	**7,938**	2634	**10,536**
Subtotal	172.7	-	253,598	-	***178,288***	-	***227,120***
Flex Commercial	14.5	1326	19,227	90%	**17,304**	1064	**15,428**
Village Commercial	4.4	1326	5,834	90%	**5,251**	1064	**4,682**
Subtotal	*18.9*	-	*25,061*	-	***22,555***	-	***20,110***
Public Parks	10	357	3,570	65%	**2,321**	442	**4,420**
Neighborhood Parks	15	-	-	-	**-**	-	**-**
Streetscapes/park ways	6.5	-	-	-	**-**	-	**-**
Subtotal	*31.5*	-	*3,570*	-	***2,321***	*Subtotal*	***4,420***
Projected Average Day Flow (Rounded)					**203,000**		**252,000**

NCSD-58 (cont'd)

As shown, the projections provided by the developer closely match the projections using water production and return factors.

The following table summarizes peak flows from Dana Reserve using the peaking factors from **Table 3-9**.

Table 3-12: NCSD Dana Reserve Wastewater Flow Comparison				
Projection Method	**Average Annual Flow (MGD)**	**Maximum Month Flow (MGD)**	**Peak Day Flow (MGD)**	**Peak Hour Flow (MGD)**
Dana Reserve Proposed Peaking Factor	-			2.5 x AAF
Dana Reserve Specific Plan	0.204		--	0.51
Peaking Factor	-	1.02 x AAF	1.14xAAF	2.6 x AAF
2007 Sewer Master Plan Demand Factors	0.251	0.256	0.286	0.653
Water Usage / Return Flows	0.203	0.207	0.231	0.528

The following table summarizes existing District flows, future District projections, future ADU contributions, and Dana Reserve projections. These flows are the basis for evaluating capacity of District facilities and anticipating impact of the Dana Reserve development.

Table 3-13: Existing and Future Flows				
Flows	**Average Annual Flow (MGD)**	**Maximum Month Flow (MGD)**	**Peak Day Flow (MGD)**	**Peak Hour Flow (MGD)**
Existing District and County Service Area Flows	0.59	0.60	0.67	1.5
Future Blacklake Service Area	0.058	0.078	0.13	0.23
Future District Service Area Flows	0.34	0.35	0.39	0.88
ADU Contributions	0.026	0.027	0.030	0.068
Dana Reserve Projections	0.20	0.21	0.23	0.53
Total Future Flows	1.22	1.26	1.46	3.25
Notes: 1. Blacklake MMF, PDF, and PHF estimated using peaking factors of 1.34, 2.30, and 4.0 respectively from the 2017 Blacklake Sewer Master Plan.				

NCSD-58 (cont'd)

3.2 Collection System Facilities

3.2.1. Existing Facilities

The District wastewater system consists of ten (10) lift stations in the Town Sewer System, three (3) lift stations in the Blacklake Sewer System, gravity sewer mains, and the Blacklake WRF and Southland WWTF. Treatment facilities are discussed in Section 4 of this study.

As discussed previously in this section, the Blacklake Sewer System will ultimately be connected to the Town Sewer System through a new lift station and force main. In addition to the ten District Town System lift stations, the Town Sewer System receives flow from two County of San Luis Obispo lift stations (Galaxy and People's Self Help or PSH). Collection system pipeline sizes and lengths for the Town Sewer System are summarized in the table below:

Table 3-14: Existing Sewer Pipeline Statistics		
Diameter (inches)	**Length (feet)**	**% of Total**
6	6,038	3.85%
8	116,994	74.67%
10	2,030	1.30%
12	22,713	14.50%
15	3,462	2.21%
18	1,162	0.74%
21	3,152	2.01%
24	1,140	0.73%
Total	**157,000 (Rounded)**	**100%**

3.2.2. Proposed Master Plan Facilities

MKN reviewed the District's 2007 Water and Sewer Master Plan (Master Plan) for proposed improvements that may be necessary to support the development. The completed Frontage Road Trunk Sewer Project implemented Master Plan recommendations between Division Street and Southland WWTF, providing additional capacity downstream of the Dana Reserve Annexation. Of the proposed improvements, the following were identified:

- Replace existing 12-inch with 15-inch between Grande and Division
- Replace existing 10-inch with 15-inch sewer main between Hill Street and Grande Street
- Replace existing 10-inch with 12-inch sewer main between Juniper Street and Hill Street
- Install 8" between Camino Caballo and Juniper Street

NCSD-58 (cont'd)

3.2.3. Hydraulic Analysis Results and Recommendations

MKN utilized the District's current SewerCAD hydraulic model to evaluate the impact of the proposed Dana Reserve development on the existing District wastewater collection system based on existing and future projected demands. The focus area was along the Frontage Road trunk sewer, which would convey flow from Dana Reserve to Southland WWTF.

Flow meter data was used to validate existing flow scenarios in the model as described in Section 3.1.1.

For the purpose of this report, scenarios were modeled for both current and future conditions within the District's Town Sewer System. Model runs were performed under steady state conditions as described below:

- Scenario 1: Existing Average Annual Flow (AADF) conditions
- Scenario 2: Existing Peak Hour Flow (PHF)
- Scenario 3: PHF conditions with Blacklake Sewer Consolidation, future conditions, and Tefft Street lift station (LS) pumped flows
- Scenario 4: PHF conditions with Blacklake Sewer Consolidation, future conditions, Tefft Street LS pumped flows, and Dana Reserve
- Scenario 5: PHF conditions with Blacklake Sewer Consolidation, future conditions, Tefft Street LS pumped flows, Dana Reserve, and Frontage Road improvements per Blacklake Sewer System Consolidation Study

Unless otherwise stated, lift stations were modeled assuming pumped flow is equivalent to inflow. Most of the lift stations pump for only a few minutes every hour, serve small areas or cul-de-sacs, and assuming all pumps were activated at the same time under peak hour conditions resulted in capacity exceedances that were not representative of system observations. In Scenarios 3, 4, and 5, Tefft St Lift Station was modeled to pump at 636 gpm, which is near the design point of 600 gpm at 89.1 ft total dynamic head (TDH).

The scenarios were evaluated based on the following depth over diameter (d/D) criteria, in conjunction with the 2007 Sewer Master Plan Update:

- For pipelines 12-inches or less: d/D < 50%
- For pipelines 15-inches or greater: d/D < 75%

Table 3-15 provides results of the analysis for scenarios listed above on the Frontage Road trunk main. **Figure3-2** identifies the sewer mains included in the table. The mains that do not meet the d/D criteria are highlighted in red. Under existing conditions, without Tefft Street LS pumped flows, the sewer system meets d/D criteria. However, once Tefft Street pumped flows are included in the analysis, the smaller, upstream mains are too small to meet d/D criteria due to submerged downstream conditions.

Increasing the size of Frontage Road trunk mains beyond sizes recommended in the Master Plan kept d/D within recommended ranges. The following improvements are recommended:

1. Replace existing 10-inch with 3,500 LF 15-inch PVC sewer main and manholes between Juniper Street and Grande Avenue; and
2. Replace existing 12-inch with 1,170 LF 18-inch PVC sewer main and manholes between Grande Avenue and Division Street.

No sewer service is available near the development. The developer will be responsible for installing a lift station with force main, gravity sewer mains, or a combination to connect Dana Reserve to the District sewer system. This decision must be approved by District staff. Installing a lift station to convey all Dana Reserve flows could result in significant impacts to the District sewer system if variable frequency drives are not utilized to reduce instantaneous peak flows from pumps. District staff should revisit the hydraulic analysis for upsizing the existing Frontage Road Trunk sewer after preliminary design for the sewer connection is submitted by the developer.

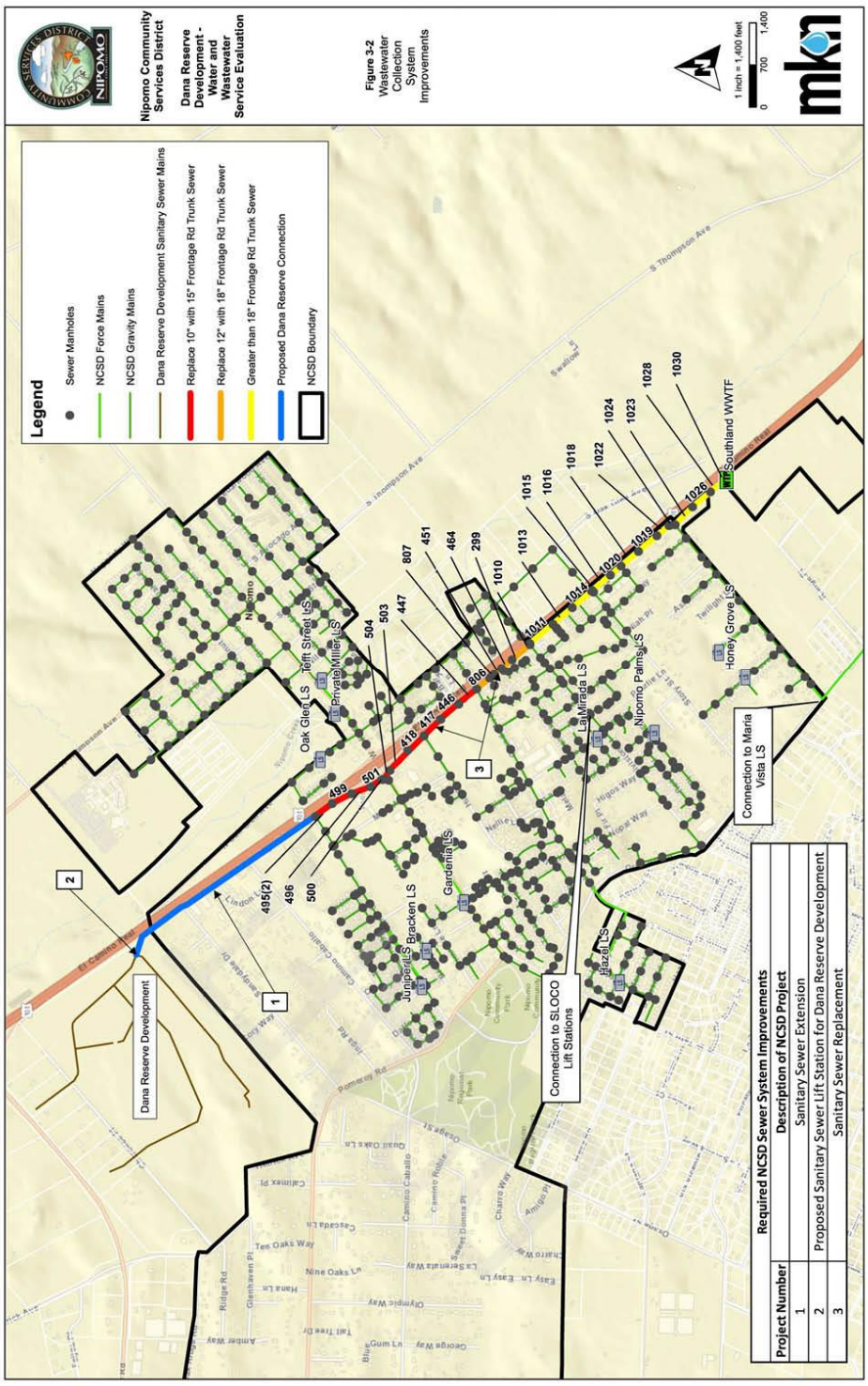
NCSD-58 (cont'd)

Table 3-15: Dana Reserve Sewer Model Results

Pipe ID From Sewer Model[1]	Existing Pipe Diameter (in)	Scenario 1: Existing ADF Condition (gpm)	Scenario 1: Existing ADF Condition (d/D)	Scenario 2: Existing PHF Condition (gpm)	Scenario 2: Existing PHF Condition (d/D)	Scenario 3: Future[2] PHF with Tefft St LS Pumped Flows (gpm)	Scenario 3: Future[2] PHF with Tefft St LS Pumped Flows (d/D)	Scenario 4: Future[2] PHF with Tefft St LS Pumped Flows and Dana Reserve (gpm)	Scenario 4: Future[2] PHF with Tefft St LS Pumped Flows and Dana Reserve (d/D)	Scenario 5: Future[2] PHF with Tefft St LS Pumped Flows, Dana Reserve, and Frontage Rd Improvements[3] (gpm)	Scenario 5: Future[2] PHF with Tefft St LS Pumped Flows, Dana Reserve, and Frontage Rd Improvements[3] (d/D)
495(2)	10	24	14.6%	62	23.3%	379	80.6%	746	100.0%	746	49.4%
499	10	24	14.8%	62	23.7%	379	100.0%	746	100.0%	746	50.4%
496	10	24	15.3%	62	24.6%	379	100.0%	746	100.0%	746	52.7%
501	10	24	17.1%	62	29.5%	379	100.0%	746	100.0%	746	56.8%
500	10	24	21.1%	62	36.2%	379	100.0%	746	100.0%	746	58.8%
504	10	60	23.2%	156	38.0%	579	100.0%	946	100.0%	946	56.9%
503	10	63	24.2%	165	39.8%	588	100.0%	955	100.0%	955	59.3%
418	10	63	22.8%	165	37.5%	588	83.1%	955	100.0%	955	56.7%
417	10	66	18.2%	171	29.6%	679	61.9%	1,046	100.0%	1,046	44.2%
446	10	66	17.9%	171	29.0%	679	60.3%	1,046	100.0%	1,046	48.9%
447	10	66	33.3%	171	55.1%	684	83.2%	1,051	100.0%	1,051	69.2%
806	12	131	30.7%	339	50.7%	994	100.0%	1,361	100.0%	1,361	59.3%
807	12	132	30.2%	342	49.2%	997	100.0%	1,364	100.0%	1,364	57.1%
451	12	132	31.6%	344	51.5%	999	100.0%	1,365	100.0%	1,365	59.3%
464	12	134	29.5%	349	49.9%	1,003	100.0%	1,370	100.0%	1,370	58.8%
299	12	134	29.8%	349	50.1%	1,003	82.0%	1,370	87.5%	1,370	57.9%
1010	21	235	15.0%	609	24.2%	1,305	35.9%	1,672	41.0%	1,672	41.0%
1011	21	235	15.1%	609	24.3%	1,305	36.0%	1,672	41.0%	1,672	41.0%
1013	21	238	13.6%	619	21.8%	1,315	32.0%	1,682	36.4%	1,682	36.4%
1014	21	238	16.7%	619	27.2%	1,315	40.2%	1,682	44.7%	1,682	44.7%
1015	21	373	18.7%	968	30.5%	2,075	45.3%	2,442	49.2%	2,442	49.2%
1016	21	384	18.2%	998	29.6%	2,120	43.9%	2,486	47.9%	2,486	47.9%
1020	21	384	18.9%	998	30.8%	2,120	45.5%	2,486	49.5%	2,486	49.5%
1018	21	386	18.5%	1,004	30.0%	2,125	44.5%	2,492	48.6%	2,492	48.6%
1019	21	386	18.5%	1,004	30.1%	2,125	44.6%	2,492	48.7%	2,492	48.7%
1022	21	386	18.5%	1,004	30.0%	2,125	44.5%	2,492	48.6%	2,492	48.6%
1024	21	386	17.2%	1,004	28.2%	2,125	42.1%	2,492	49.6%	2,492	49.6%
1023	21	386	20.2%	1,004	32.8%	2,125	49.5%	2,492	53.9%	2,492	53.9%
1025	24	411	19.3%	1,068	31.2%	2,358	48.0%	2,725	52.3%	2,725	52.3%
1026	24	411	19.4%	1,068	31.4%	2,358	48.4%	2,725	52.7%	2,725	52.7%
1028	24	411	17.8%	1,068	28.9%	2,358	44.0%	2,725	47.7%	2,725	47.7%
1030	24	411	15.1%	1,068	24.4%	2,358	36.6%	2,725	39.5%	2,725	39.5%

Notes:
1. Pipelines are in order from upstream to downstream
2. Future flows include parcels that will tie into the sewer system, potential ADUs developments, and Blacklake pumped flows
3. Frontage Rd pipeline improvements include increasing pipe diameters from 10-inch to 15-inch and from 12-inch to 18-inch

NCSD-58
(cont'd)


Nipomo Community Services District
Dana Reserve Development - Water and Wastewater Service Evaluation
Figure 3-2 Wastewater Collection System Improvements
1 inch = 1,400 feet
0 700 1,400
mkn
Legend
Sewer Manholes
NCSD Force Mains
NCSD Gravity Mains
Dana Reserve Development Sanitary Sewer Mains
Replace 10" with 15" Frontage Rd Trunk Sewer
Replace 12" with 18" Frontage Rd Trunk Sewer
Greater than 18" Frontage Rd Trunk Sewer
Proposed Dana Reserve Connection
NCSD Boundary
Dana Reserve Development
Connection to SLOCO Lift Stations
Connection to Maria Vista LS
Required NCSD Sewer System Improvements
Project Number
Description of NCSD Project
1 Sanitary Sewer Extension
2 Proposed Sanitary Sewer Lift Station for Dana Reserve Development
3 Sanitary Sewer Replacement
Oak Glen LS
Jeffs Street LS
Private Miller LS
La Mirada LS
Nipomo Palms LS
Honey Grove LS
Gardenia LS
Juniper LS
Bracken LS
Hazel LS
Southland WWTF
El Camino Real
Pomeroy Rd
S Thompson Ave
Tefft St
Dale St
Orange St
Willow Rd
Hetrick Ave
Tee Oaks Way
Nine Oaks Ln
Olympic Way
Amber Way
Ridge Rd
Camino Caballo
Charro Way
Easy Ln
Sweet Donna Pl
Serenata Way
Higgins Way
Twilight Dr
Nipomo Regional Park
Nipomo Community Park
Nipomo Creek Park
Cemetery
Nipomo Elementary School
Nipomo High School
Nipomo Jr High School
Nipomo Library
Nipomo Post Office
Nipomo Fire Station
Nipomo Sheriff Substation
Nipomo Veterans Memorial Hall
Nipomo Youth Center
Nipomo Skate Park
Nipomo Dog Park
Nipomo Community Garden
Nipomo Community Pool
Nipomo Community Center
Nipomo Community Park
Nipomo Regional Park
Nipomo Creek Park
Nipomo

3.2.4. Recommended Offsite Improvements

The hydraulic analysis indicated that the Dana Reserve development will likely impact the District's wastewater collection system most significantly during PHF conditions. The District should consider implementing the following projects in Frontage Road:

1. Replace existing 10-inch with 3,500 LF 15-inch PVC sewer main and manholes between Juniper Street and Grande Avenue; and
2. Replace existing 12-inch with 1,170 LF 18-inch PVC sewer main and manholes between Grande Avenue and Division Street.
3. The developer will also need to extend sewer service to the Dana Reserve development from Juniper Street.

3.2.5. Evaluation of Proposed Onsite Improvements

The DRSP identifies a network of sewer mains conveying flow to the proposed connection along Frontage Road. Sizes are not identified but it is assumed all mains will be designed and constructed in accordance with District standards. Two lift stations are identified to convey flow from neighborhoods 8 and 9 (near Hetrick Avenue) to the onsite collection system. Not enough information was provided to evaluate capacity of these onsite improvements. It is recommended the developer and District evaluate onsite sewer design and the potential impact of the two lift stations on proposed offsite improvements after preliminary design proceeds.

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(cont'd)

4.0 WASTEWATER TREATMENT FACILITY

4.1 Influent Flow and Loading Analysis

4.1.1. District Projections

Historical water quality data was analyzed from the Southland WWTF between January 2019 and December 2020. Average annual and maximum monthly flows were calculated as described in Section 3.1.1 and were applied to this water quality data to calculate influent loading values for 5-day biological oxygen demand (BOD_5), total suspended solids (TSS) and Total Kjeldahl Nitrogen (TKN).

Through the Blacklake Sewer Consolidation Project, the Blacklake WRF will be decommissioned and all Blacklake flow will be sent to Southland WWTF as discussed in the previous section. In order to determine whether the Southland WWTF has the capacity to handle the added influent from the proposed Dana Reserve development, the combined existing influent flows and loading rates were analyzed.

As a result of the influent from Blacklake being transmitted through a force main and then being conveyed through a gravity sewer main, the rate of flow from Blacklake will likely be dampened to some extent before reaching the Southland WWTF. As such, using the same peak hour flowrates that were assumed for the Blacklake WRF to estimate the increased inflow to the Southland WWTF is a conservative analysis. Flow values shown in **Table 4-1** are a combination of existing flows to the Southland WWTF and anticipated flows from the Blacklake WRF.

Table 4-1: Existing and Projected Influent Flows and Loadings from District Service Area

Parameter	Unit	Existing
ADF	MGD	0.65
MMF	MGD	0.68
PHF	MGD	1.76
Average Annual BOD_5 Concentration	mg/L	403
Average Annual BOD_5 Load (Rounded)	ppd	2,170
Maximum Month BOD_5 Concentration	mg/L	537
Maximum Month BOD_5 Load (Rounded)	ppd	2,890
Average Annual TSS Concentration	mg/L	289
Average Annual TSS Load (Rounded)	ppd	1,560
Maximum Month TSS Concentration	mg/L	333
Maximum Month TSS Load (Rounded)	ppd	1,790

NCSD-58 (cont'd)

4.1.2. Dana Reserve Projections and Impact on Flows and Loadings at Southland WWTF

The projected flows and loading from the Dana Reserve development are summarized in **Table 4-2**. Since the District's sewer service area is primarily residential, it is assumed that the BOD and TSS concentrations in the wastewater from the development will be similar to what is currently observed at the Southland WWTF.

Table 4-2: Projected Influent Flows and Loadings from Dana Reserve Project

Parameter	Unit	Quantity
ADF	MGD	0.204
MMF	MGD	0.210
PHF	MGD	0.533
Average Annual BOD_5 Concentration	mg/L	403
Average Annual BOD_5 Load	ppd	686
Maximum Month BOD_5 Concentration	mg/L	537
Maximum Month BOD_5 Load	ppd	913
Average Annual TSS Concentration	mg/L	289
Average Annual TSS Load	ppd	492
Maximum Month TSS Concentration	mg/L	333
Maximum Month TSS Load	ppd	566

Flows from Dana Reserve will result in a 31% increase over existing District service area maximum month flows and loads. The projected flows and loads at Southland WWTF including the Dana Reserve Project are summarized in **Table 4-3**.

NCSD-58 (cont'd)

Table 4-3: Projected Influent Flows and Loadings from Dana Reserve Project and District Service Area

Parameter	Unit	Existing + Dana Reserve
ADF	MGD	0.85
MMF	MGD	0.89
PHF	MGD	2.30
Average Annual BOD_5 Concentration	mg/L	403
Average Annual BOD_5 Load (Rounded)	ppd	2,860
Maximum Monthly BOD_5 Concentration	mg/L	536
Maximum Monthly BOD_5 Load (Rounded)	ppd	3,800
Average Annual TSS Concentration	mg/L	289
Average Annual TSS Loading (Rounded)	ppd	2,050
Maximum Monthly TSS Concentration	mg/L	333
Maximum Monthly TSS Loading (Rounded)	ppd	2,360

4.2 Existing Facilities

Wastewater generated in and collected by the District is conveyed to Southland WWTF, a secondary wastewater treatment facility that uses an influent lift station with two (2) screw centrifugal pumps, two (2) fine screens, one (1) grit removal system with classifier, one (1) in-pond extended aeration system (Parkson Biolac®), two (2) secondary clarifiers, 10 percolation ponds. The WWTF also has an existing gravity belt thickener and twelve (12) concrete lined sludge drying beds for waste sludge dewatering. The District recently installed a dewatering screw press to assist in the waste sludge dewatering, particularly during wet weather. A 400 KVA generator provides backup power when needed.

4.3 Proposed Master Plan Facilities

The Southland WWTF site was planned to allow phased improvements as demand increases. The Phase I design included design and construction of the above listed facilities, replacing the previous treatment pond facility to maintain and improve treatment for increasing flows and loading.

Phases II and III were outlined in Southland WWTF Master Plan Amendment 1 (AECOM, 2010) to plan for anticipated increases in flow rate and loading at Southland WWTF. Equipment and processes were designed to be able to meet greater demands with additional equipment, such as additional aeration basins or sludge digesters; in a phased approach without requiring removal or replacement of previous improvements. Anticipated phases and major system components are summarized in the tables below. Planning "triggers", or flows, at which each phase should be implemented, are also included in **Table 4-4**. At the time the master plan was developed, the 90th percentile BOD_5 and TSS were both 300 mg/L for use in sizing facilities. The existing maximum month TSS is slightly lower (289 mg/L) whereas the BOD_5 is higher (333 mg/L). Therefore, the planning "triggers" should be reconsidered based on actual flows and loadings as compared to the Amendment 1 recommendations.

In the original Amendment 1, the District had planned to construct new aerobic sludge digesters in Phases I and III. However, during the Phase I design, the District opted to install a sludge thickening system instead and twelve (12) sludge drying beds were constructed to store sludge. The aerobic digesters were no longer needed. The sludge handling system was further improved by installing a new dewatering screw press as described above.

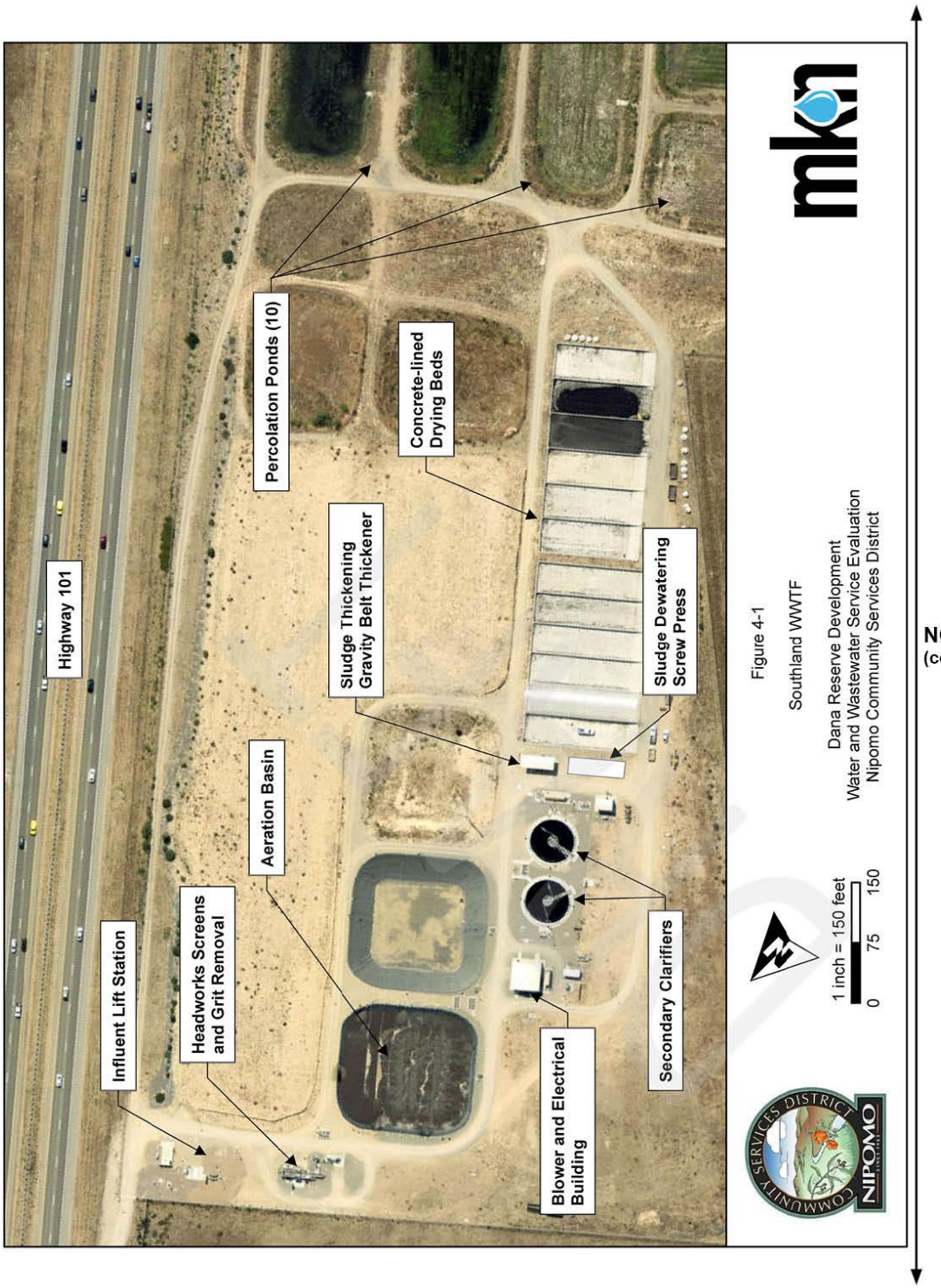
NCSD-58 (cont'd)

Table 4-4: Southland WWTF Phasing Plan

Project Phase	Capacity (MMF, MGD)	Planning Trigger (MMF, MGD)
Phase 1 – Existing Facilities	0.9	--
Phase 2	1.28	0.7
Phase 3	1.80	1.4

Phase II included a new pump and associated valves, piping, and controls; aeration system, and blower for Aeration Basin #2; a second clarifier; new concrete liners and decant system in one drying bed; and a new emergency generator. The secondary clarifier, twelve (12) concrete lined drying beds with decant system, and generator were installed as part of Phase I. A third blower was recently installed in the blower building.

Phase III included a second grit removal system and classifier; new Aeration Basin #3 with liner, air piping and headers, controls, and aeration equipment; third clarifier; and new concrete liners and decant system in one drying bed. As noted above, all lined drying beds were installed as part of Phase I. The existing plant is shown on **Figure 4-1**.



NCSD-58
(cont'd)

4.4 Process Capacity Analysis

The process flow diagram and design parameters from the Southland WWTF Phase 1 Improvements plans are included as Appendix B. The ability of each process to handle the anticipated combined existing flows and loads was reviewed in the following sub-sections.

4.4.1. Influent Lift Station

The existing influent lift station at the Southland WWTF consists of two screw centrifugal pumps with 20 horsepower motors, and each with a capacity of 1,700 GPM (2.45 MGD) at 30 feet of total dynamic head (TDH). The pumps alternate operation, with one pump operating and the other remaining on standby to provide 100% redundancy.

The existing combined influent PHF is estimated to be 2.30 MGD, which leaves excess capacity of 0.15 MGD while maintaining one pump for standby.

Table 4-5: Influent Lift Station Capacity (One Pump Operating)

Flow Condition	Units	Design Capacity	Existing + Dana Reserve
Peak Hour Flow	MGD	2.45	2.30
Available Capacity	MGD	-	0.15

With two pumps operating and a third on standby, the estimated capacity is approximately 4.83 MGD as shown in **Table 4-6** below.

Table 4-6: Influent Lift Station Capacity (Two Pump Operating)

Flow Condition	Units	Design Capacity	Existing + Dana Reserve
Peak Hour Flow	MGD	4.83	2.30
Available Capacity	MGD	-	2.53

NCSD-58 (cont'd)

The 2012 Conceptual Design Report (CDR) for Southland WWTF identified the future installment of a third pump to handle increased flow in future phases. The wetwell was sized for this anticipated upgrade and piping was installed to accommodate a third similarly-sized pump to handle the increased influent PHF while maintaining one pump in standby mode. The District plans to install a third pump to provide additional required redundancy. This will also meet demands from Dana Reserve.

4.4.2. Influent Screens

Southland's existing headworks screen system consists of two shaftless screw screens designed for a peak flow of 4.83 MGD, with a maximum equipment capacity of 5.5 MGD.

With a rated equipment capacity of 5.5 MGD each, the headworks screens have the ability to handle anticipated combined existing and future peak hour flow rates.

4.4.3. Grit Removal

Southland WWTF's existing grit removal system consists of one vortex-type grit tank with a single self-priming grit pump. One grit tank was installed during the Phase I Improvements, with provisions to add a second in the future.

The grit tank was designed for a peak flow of 2.5 MGD. The combined existing influent PHF with Dana Reserve is estimated to be 2.30 MGD. Since existing flows with Dana Reserve will nearly meet capacity, a second grit removal system is required for redundancy. With the second grit removal system installed, the design capacity of 5.0 MGD will provide an estimated 2.7 MGD of additional capacity.

4.4.4. Extended Aeration System

Southland WWTF currently operates one extended aeration basin with a total volume of 1.41 million gallons (MG) and a design mixed liquor suspended solids (MLSS) concentration of 3,223 mg/L. The existing basin was designed for a solid retention time (SRT) of 60 to 70 days and a hydraulic retention time (HRT) of 1.63 days. The basin was sized based on a recommended range of BOD_5 loading to the aeration basin of 5 to 12 ppd per 1000 cubic feet of basin volume. The combined loads are compared with the design minimum and maximum capacity in the table below.

Table 4-7: Extended Aeration Basin Capacity (One Basin)

Condition	Units	Recommended Design Criteria (Min – Max)[3]	Existing + Dana Reserve
Average Annual BOD_5 Load	ppd	943 – 2,262	2,860
Maximum Month BOD_5 Load	ppd	943 – 2,262	3,800

The existing maximum month BOD_5 load with Dana Reserve exceeds the maximum design criteria by 1,538 ppd, indicating that a second aeration basin will be needed. In addition to the aeration basin, new diffusers, and supporting electrical, mechanical, and instrumentation will be required. A new blower, new blower building or expansion of the existing blower building will be necessary if aeration is not sufficient to meet projected demands.

NCSD-58 (cont'd)

4.4.5. Secondary Clarifiers

Two existing 55-foot diameter concrete circular secondary clarifiers are operating at Southland WWTF, each with a design overflow rate (OFR) of 240 gallons per day per square foot (gpd/ft^2) at ADF and 694 gpd/ft^2 at PHF. Industry standards[4] recommend overflow rates of 200 – 400 gpd/ft^2 for average flow conditions and 600 – 800 gpd/ft^2 at peak flow conditions. Each clarifier is designed for a solids loading of 0.95 pounds per square foot per hour ($lbs/ft^2/hr$) at average conditions and 1.67 $lbs/ft^2/hr$ at peak conditions. The design overflow rates and solids loading rates are compared with the anticipated existing combined flow and loading conditions in **Table 4-8**.

[3] Min = 5 ppd/1000 cf of basin volume. Max = 12 ppd/1000 cf of basin volume.
[4] Wastewater Engineering Treatment & Reuse, 4th Edition, Tchbanoglous, et. al.

Table 4-8: Secondary Clarifier Existing Capacity				
	Average Overflow Rate	**Peak Overflow Rate**	**Average Solids Loading Rate**	**Peak Solids Loading Rate**
Units	gpd/ft^2	gpd/ft^2	$lb/ft^2/hr$	$lb/ft^2/hr$
Design Value	240	694	0.95	1.67
Recommended Range	200 - 400	600 - 800	0.2 - 1.0	<1.4
1 Clarifier	358	967	1.00	2.71
2 Clarifiers	179	483	0.50	1.35

With one clarifier operating, the existing combined average OFR falls well within the recommended range outlined by Tchbanoglous, et al. (ibid.) However, the combined peak OFR exceeds the recommended maximum value by 167 gpd/ft^2 and the peak solids loading rate exceeds the maximum value by 1.31 $lb/ft^2/hr$.

With two clarifiers operating, both the existing combined average OFR and the peak OFR fall under the lower bound of the recommended range. However, this is not anticipated to be an issue as the District is successfully operating two clarifiers under existing conditions. The existing average solids loading rate falls within the recommended range for one clarifier and the peak solids loading rate is less than the maximum with two operating clarifiers. However, this leaves no redundancy in the event one clarifier is out of service. Therefore, a third clarifier is recommended to meet existing conditions with Dana Reserve's contribution.

NCSD-58 (cont'd)

The existing clarifiers have Return Activated Sludge (RAS) pump stations, consisting of two pumps, each with a capacity of 875 GPM. The Phase I Concept Design Report (CDR – AECOM, 2015) assumed RAS flowrates at 150% of the AAF and designed the RAS pumps to meet 150% of 0.84 MGD (approximately 1.2 MGD). The existing combined AAF is anticipated to be 0.85 MGD which is greater than the design range of the pumps. District staff can operate RAS pumps closer to 100% of AAF. However, it is recommended to upgrade RAS pumps to provide flexibility under increased flows from Dana.

4.4.6. Sludge Thickener

Southland WWTF currently conveys between 34,000 and 51,000 gallons of sludge per day to the existing gravity belt thickener. The waste sludge has a solids concentration between 0.35 and 0.5 percent total solids. The gravity belt thickener currently operates between 6 and 7 hours per day for approximately 35 hours per week. The annexation and Blacklake consolidation will increase the average annual flow, organic loads, and solids loads at the Southland WWTF by 44 percent, which will have a significant impact on the run time for the thickener. It is assumed sludge feed rates under the combined existing and Dana Reserve loading scenario will increase as a percentage based on average annual loading. This methodology yields an estimated sludge waste rate between 49,000 and 74,000 gallons per day for existing combined load conditions. It is anticipated that the sludge thickener may need to run for an additional 16 hours per week, between 9 and 11 hours per day, for a total of approximately 51 hours per week. This would require plant staff to work an additional two days per week to operate and observe the gravity belt thickener. An additional thickener is necessary for redundancy.

4.4.7. Sludge Dewatering Screw Press and Sludge Drying Beds

The District is completing installation of a new sludge dewatering screw press at the Southland WWTF. The sludge dewatering screw press will have a hydraulic capacity of 15 to 90 GPM and a solids capacity of 250 pounds per

hour (PPH). The design feed concentration ranges from 0.5% to 3% total solids and the dewatered sludge concentration is a minimum of 15% total solids. During normal operation, the screw press will receive thickened sludge from the gravity belt thickener, and, thus, will operate for the same durations as the thickener. Two days of operation will be added to accommodate Dana Reserve loads. A second press is necessary for redundancy.

In the event a screw press is taken out of service, the District has sludge drying beds that are utilized to store dewatered sludge. They can be used to temporarily store thickened sludge in case a screw press is out of service. The remaining screw press can also be operated for longer periods during the day to accommodate a short-term outage.

4.5 Future Water Quality Requirements

The Central Coast Regional Water Quality Control Board (RWQCB) recently adopted General Waste Discharge requirements for Discharges from Domestic Wastewater Systems with Flows Greater than 100,000 gallons per day (Order No. R3-2020-0020). RWQCB staff have indicated that the Southland WWTF will likely be enrolled under this General Order. However, the schedule for this is not known. The General Order contains stricter effluent limits, including a total nitrogen limit of 10 mg/L and varying limits for salts, depending on the underlying groundwater basin. The General Order includes a provision allowing 24 months to come into compliance for dischargers that are unable to meet the effluent requirements after enrollment under the Order. Additional time may be granted through a request for a time schedule order. The effluent limits anticipated for Southland WWTF under this General Order are summarized in the table below.

NCSD-58
(cont'd)

Table 4-9: General Order R3-2020-0020 Secondary Treatment Effluent Limits (Tables 5 and 6 of the Order)				
Constituent	**Units**	**30-day Average**	**7-day Average**	**Sample Maximum**
BOD_5	mg/L	30	45	NA
TSS	mg/L	30	45	NA
Settleable Solids	mg/L	0.1	0.3	0.5
pH	NA	6.5 – 8.4	NA	NA
Limits based on a 25-month rolling median, for the Lower Nipomo Mesa SubBasin (1)				
Total Nitrogen	mg/L	10	--	--
Total Dissolved Solids (TDS)	mg/L	710	--	--
Chloride	mg/L	95	--	--
Sulfate	mg/L	250	--	--
Boron	mg/L	0.16	--	--
Sodium	mg/L	90	--	--

Notes:
1. The General Order indicates dischargers have two options for meeting requirements for Total Nitrogen, TDS and the other salt constituents. The discharger may comply with the effluent limitations specified, or the discharger will be required to implement a groundwater monitoring program to demonstrate compliance.

NCSD-58 (cont'd)

Increasing use of Supplemental Water is anticipated to reduce discharge of TDS, chloride, and sodium from the WWTF. MKN reviewed historical effluent water quality to evaluate the existing WWTF performance regarding nitrogen reduction and ability to meet the future total nitrogen limit.

Total nitrogen in wastewater includes ammonia, nitrate, nitrite, and organic nitrogen. The Southland WWTF utilizes the Parkson Biolac® system, which when operated in the wave oxidation mode, has the ability to both nitrify (convert ammonia to nitrate) and denitrify (convert nitrate to nitrite and nitrogen gas). This will require operating the extended aeration basins at loading rates of 5 to 9 lb BOD_5/1000 cubic feet (cf), instead of the range of 5 to 12 lb BOD_5/1000 cf recommended for organics removal to meet current effluent limits.

The following table summarizes the anticipated loading of a two-basin system and the design criteria to meet this effluent nitrogen limit under current combined loading rates.

Table 4-10: Extended Aeration Basin Capacity for Denitrification via Wave Oxidation (Two Basins)			
Condition	**Units**	**System Design Criteria**	**Existing + Dana Reserve**
Average Annual BOD5 Load	lb/day	1,886 – 3,394	2,860
Maximum Month BOD5 Load	lb/day	1,886 – 3,394	3,800

As shown, a two-basin system meets the design criteria for denitrification under existing combined average annual loading but not under maximum month loading conditions.

A three-basin system was then evaluated and it was found that the capacity exceeds the requirements under each loading condition. The results of this analysis are shown in the table below.

Table 4-11: Extended Aeration Basin Capacity for Denitrification via Wave Oxidation (Three Basins)

Flow Condition	Units	Minimum System Design Criteria	Existing + Dana Reserve
Average Annual BOD5 Load	lb/day	2,829-5,091	2,860
Maximum Monthly BOD5 Load	lb/day	2,829-5,092	3,800

In summary, Aeration Basins #2 and #3 will be necessary to meet future permit requirements under existing conditions with Dana Reserve. In addition to the aeration basins, new diffusers, and supporting electrical, mechanical, and instrumentation will be required. A new blower building or expansion of the existing blower building will also be necessary.

4.6 Recommended Improvements

The following table summarizes the capacity assessment described in the previous sections.

Table 4-12: Summary of Southland WWTF Evaluation

Process	Summary of Findings	Recommendations to Meet Existing Demands with Dana Reserve
Influent Lift Station	Capacity is adequate for existing conditions.	Install a third pump, sized the same as existing
Influent Screen	Capacity is adequate for existing flowrates	–
Grit Removal	Capacity is adequate for existing conditions.	Install second grit system
Extended Aeration Basins	Additional basins required	Install Aeration Basin #2 to meet current capacity requirements. Install Aeration Basin #3 to meet anticipated permit requirements. Expand blower system as needed
Secondary Clarifiers	Overflow rate is adequate for existing conditions. Peak solids loading rate is exceeded at existing demands with Dana Reserve.	Install third clarifier for redundancy. Upgrade RAS pumping system.
Gravity Belt Thickener (GBT)	Additional operating hours will be necessary to meet existing demands with Dana Reserve. No redundancy is available if the single GBT fails.	Install second GBT
Dewatering Screw Press	Additional press required to meet combined loading.	Install second screw press

NCSD-58 (cont'd)

5.0 PROJECT COST OPINIONS

Appendix C includes assumptions and calculations used to develop conceptual project cost opinions. The opinions of probable project costs presented in this study were developed according to the AACE International Class 4 level cost estimate classification. The cost opinions incorporate the engineer's judgment as a design professional, are planning level budget estimates, and are supplied for the general guidance of the District.

Since MKN has no control over the cost of labor and materials, MKN does not guarantee the accuracy of such opinions as compared to contractor bids or actual cost to the District. It is recommended that an opinion of cost be developed and updated during project design. A construction contingency of 30% and allowance for engineering, construction management, and administration of 30% were applied to construction cost subtotals. All cost opinions were developed in September 2021 (ENR-LA = 13212.48).

5.1 Offsite Water Improvements

The following table summarizes project costs to connect the Dana Reserve water system as described in Section 3. Projects are identified on Figure 6-1. Costs for the developer to extend the waterline to the existing connection along Frontage Road are not included below.

Table 5-1: Water Transmission Main to Serve Dana Reserve

Project	Description	Cost
1,2,5	New 16" Main on North Oak Glen Drive and Tefft Street	$10,510,000
	Total	**$10,510,000**

Table 5-2 summarizes project costs for the end-of-line (EOL) looping at Willow Road and storage improvements at the Foothill Tank and Joshua Road sites.

NCSD-58 (cont'd)

Table 5-2: Water System Storage and Looping Improvements to Serve Dana Reserve

Project Number	Description	Cost
4	Willow Road EOL Project	$260,000
6	Foothill Tank Improvements	$3,920,000
7	Joshua Road Reservoir	$4,760,000
	Total	**$8,940,000**

5.2 Offsite Wastewater Collection and Treatment Improvements

The following table summarizes project costs to connect the Dana Reserve wastewater system as described in Sections 3 and 4. Costs for the developer to connect to the existing system are not included below.

Table 5-3: Wastewater Improvements to Serve Existing Conditions and Dana Reserve

Project	Description	Cost
1 – 3	Wastewater Collection Improvements	$3,630,000
4 – 9	Southland WWTF Improvements	$15,960,000
	Total	**$19,590,000**

6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 Water

The Dana Reserve Development will have a significant impact on District water and wastewater facilities. Groundwater and 2025 NSWP allocation are adequate to serve existing and future demands with Dana Reserve. However, pipeline and storage improvements will be needed. Figures 6-1 and 6-2 identify the projects described below.

Installing the Willow Road EOL Connection will address the District's looping requirements. Implementing the following project is recommended to convey NSWP water to Dana Reserve:

- Construction of new 16-inch pipeline on North Oak Glen Drive from Tefft Street to the Sandydale connection point.
- Replacement of the existing 10-inch AC pipeline from the Foothill Tanks to North Oak Glen Drive on Tefft Street with a new 16-inch PVC pipeline.

Storage improvements are also recommended to manage additional flow from NSWP and to meet emergency, fire flow, and operational needs. The recommended improvements for Foothill Tank site include a new 1.0 MG storage tank, chloramination improvements, and an automated valve station to improve storage and protect water quality. A new 500,000 gallon reservoir at Joshua Road Pump Station should be constructed to provide required redundancy for NSWP.

The following table summarizes the recommended improvements

NCSD-58 (cont'd)

Table 6-1: Recommendations for NCSD Water System Improvements

Project	Required Improvements
1, 2, 5	New 16" Main on North Oak Glen Drive and Tefft Street
3	Frontage Road Waterline Extension
4	Willow Road EOL Project
6	Foothill Tank Improvements
7	Joshua Road Reservoir

6.2 Wastewater

A new sewer connection from the development to Juniper Street is required which may involve a lift station and force main with sections of gravity sewer. Lift station peak flows should be managed with the use of variable frequency drives to reduce impact to receiving sewers. Improvements along Frontage Road will also be necessary to accommodate flow from the development under existing District demands. These project improvements are listed below and identified in Figures 6-3 and 6-4:

Table 6-2: Recommendations for NCSD Sewer System Improvements	
Project	**Required Improvements**
1	Connection to Dana Reserve collection area.
2	Potential sanitary sewer lift station for Dana Reserve Development
3	Replace existing 10-inch with 3,500 LF of 15-inch PVC sewer main and manholes between Juniper Street and Grande Avenue.
	Replace existing 12-inch with 1,170 LF 18-inch PVC sewer main and manholes between Grande Avenue and Division Street.

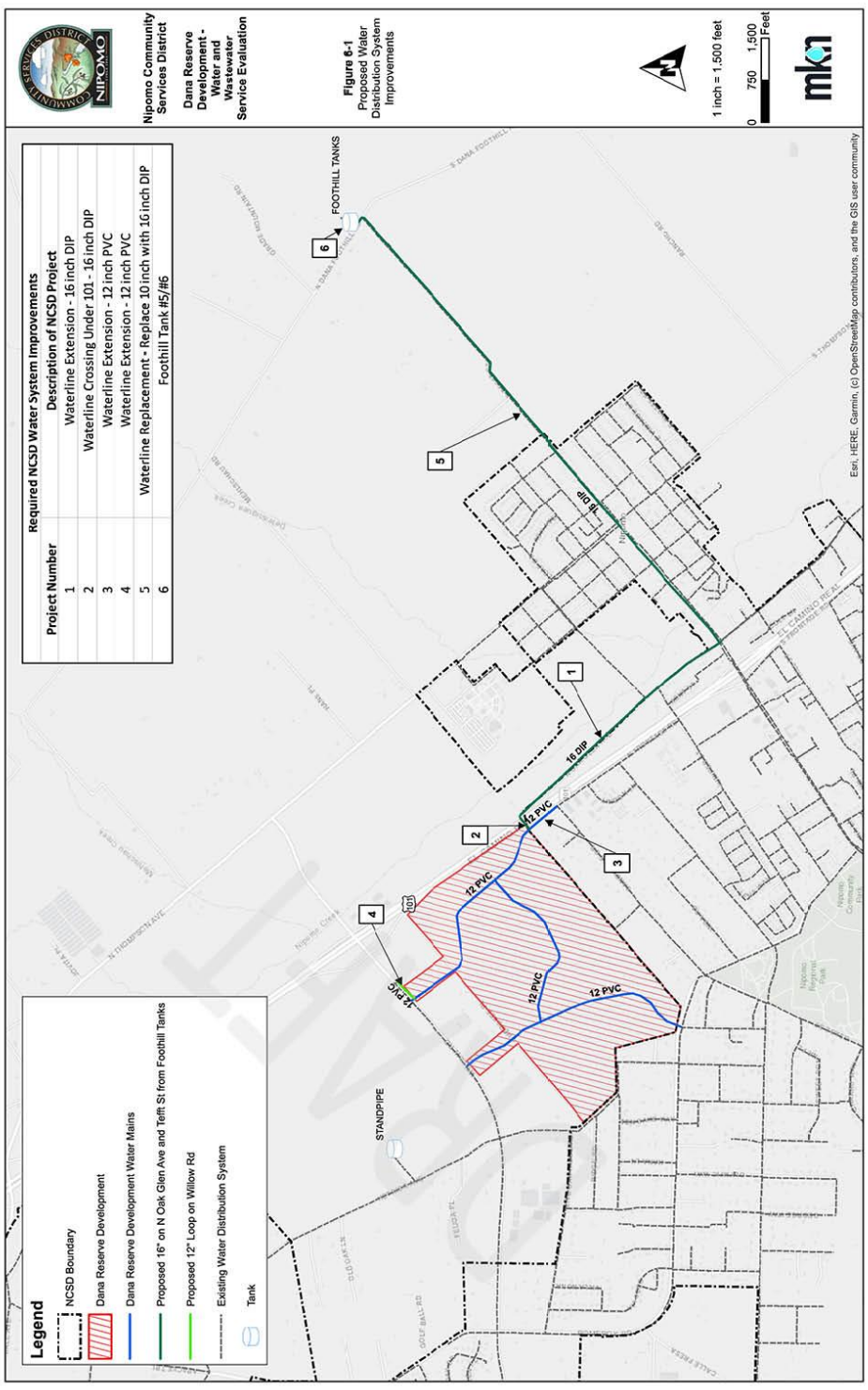
Southland WWTF will require significant improvements to meet existing demands with Dana Reserve and future demands. The table below summarizes improvements necessary to meet current Waste Discharge Requirements.

Table 6-3: Recommendations for Southland WWTF Improvements		
Project	**Process**	**Required Improvement**
4	Influent Lift Station	Install a third pump, sized the same as existing
5	Grit Removal	Install second grit system
6	Extended Aeration Basins	Install Aeration Basins #2 & #3 and expand aeration system
7	Secondary Clarifiers	Install third clarifier for redundancy. Upgrade RAS pumping system.
8	Gravity Belt Thickener (GBT)	Install second GBT
9	Dewatering Screw Press	Install second screw press

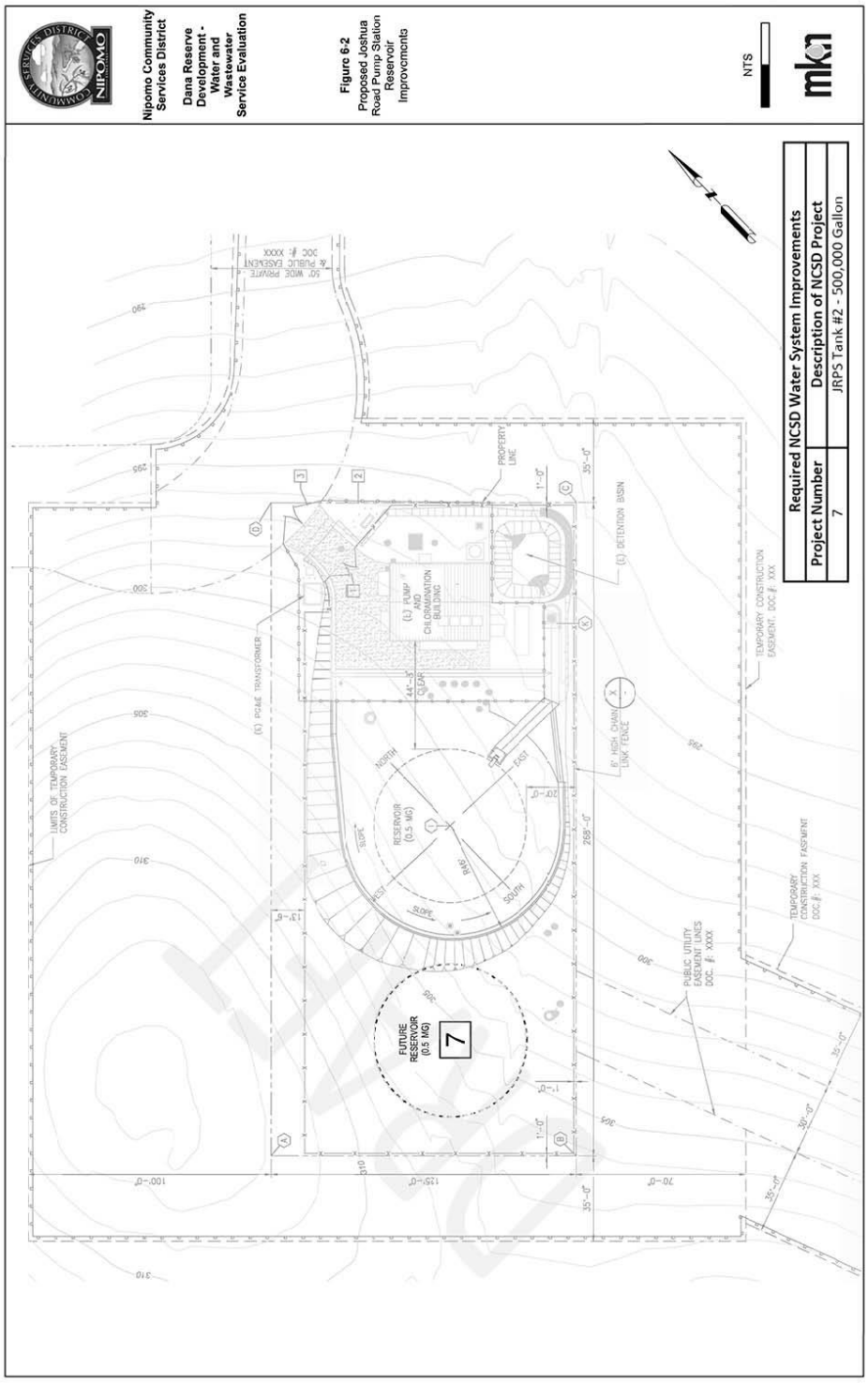
NCSD-58 (cont'd)

In addition to the aeration basins, new diffusers and supporting electrical, mechanical, and instrumentation will be required. A new blower building or expansion of the existing blower building will also be necessary.

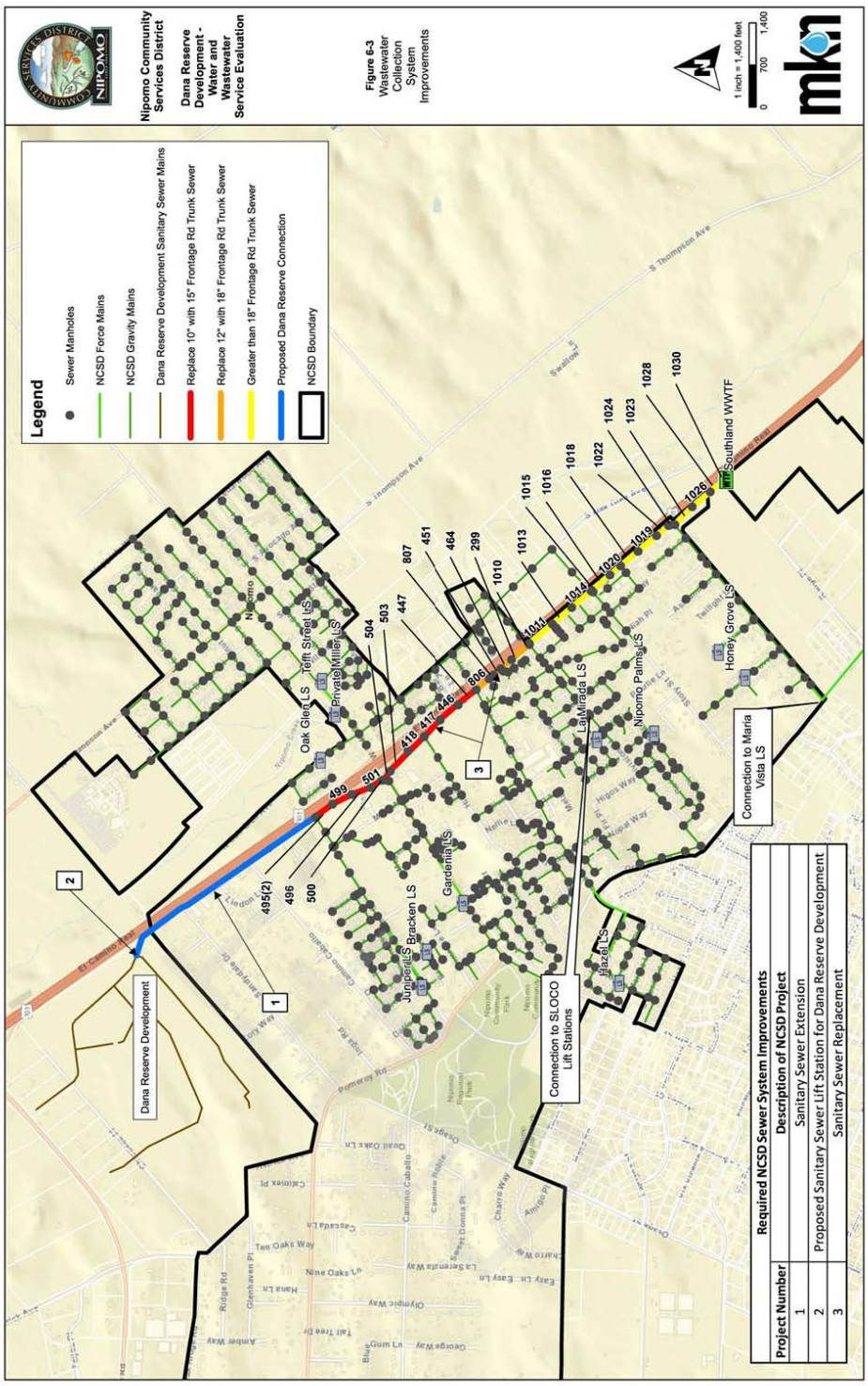
A summary of water and sewer improvement projects is illustrated in Figure 6-5.



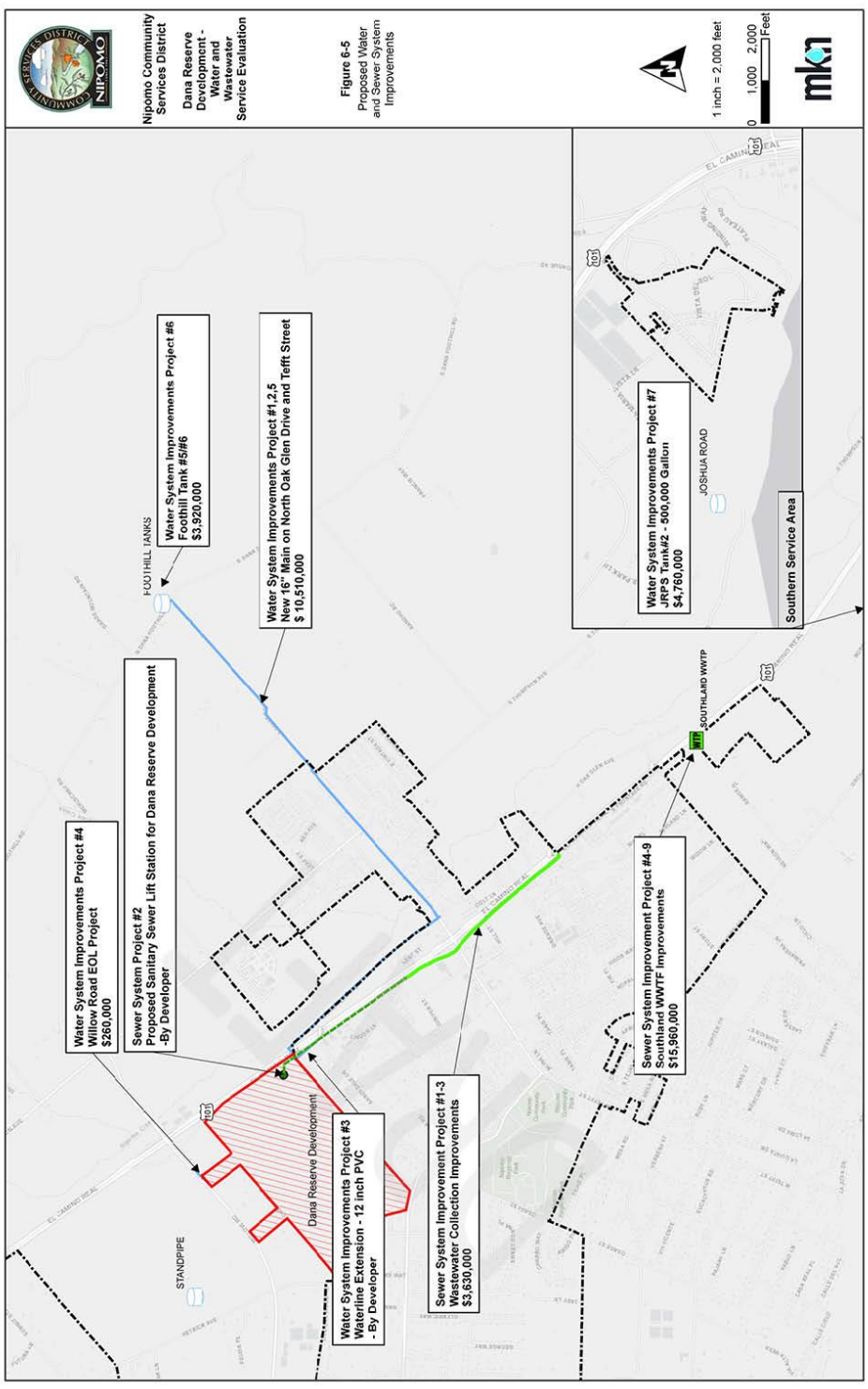
NCSD-58
(cont'd)



NCSD-58
(cont'd)


Nipomo Community Services District
Dana Reserve Development - Water and Wastewater Service Evaluation
Figure 6-3
Wastewater Collection System Improvements
Legend
Sewer Manholes
NCSD Force Mains
NCSD Gravity Mains
Dana Reserve Development Sanitary Sewer Mains
Replace 10" with 15" Frontage Rd Trunk Sewer
Replace 12" with 18" Frontage Rd Trunk Sewer
Greater than 18" Frontage Rd Trunk Sewer
Proposed Dana Reserve Connection
NCSD Boundary
1 inch = 1,400 feet
0 700 1,400
Dana Reserve Development
Connection to SLOCO Lift Stations
Connection to Maria Vista LS
Required NCSD Sewer System Improvements
Project Number
Description of NCSD Project
1
Sanitary Sewer Extension
2
Proposed Sanitary Sewer Lift Station for Dana Reserve Development
3
Sanitary Sewer Replacement
Oak Glen LS
Tefft Street LS
Private Miller LS
Jungerius LS
Bracken LS
Gardenia LS
LaMirada LS
Nipomo Palms LS
Honey Grove LS
Blacklake LS
Southland WWTF
El Camino Real
Pomeroy Rd
S. Thompson Ave
Swallow Ln
Twilight Ln
Higgins Way
Nipomo Creek Park
Nipomo Regional Park
Osage St
Dune Oaks Ln
Camino Caballo
Camino Kolette
Sweet Donna Pl
Charro Way
Amigo Pl
Easy Ln
Olympic Way
Nine Oaks Ln
Ten Oaks Way
Cresta Ln
Calimex Pl
Hana Ln
Ridge Rd
Grandview Pl
Amber Way
Tall Tree Dr
George Way
Gum Ln
Blue
Lindon Ln
Sandydale Dr
Camino Caballo
Mesa Rd
Mesa Ct
Nipomo
Sunset Ln
Jamison Ave
Kaweah Ln
Sierra Way
Nellie Ln
Higgins Way
Twilight Pl
Ave
Easy Ln
Charro Way
Amigo Pl
Nipomo Creek Park
Nipomo Regional Park
Osage St
Dune Oaks Ln
Camino Caballo
Camino Kolette
Sweet Donna Pl
Charro Way

NCSD-58
(cont'd)



NCSD-58
(cont'd)

APPENDIX A

NCSD-58
(cont'd)

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Sewer Flow Monitoring 2020 Nipomo, CA

October 23, 2020 – November 28, 2020

Final Report Submitted to **MKN & Associates, Inc.**
December 22, 2020



ADS ENVIRONMENTAL SERVICES

15201 Springdale Street
Huntington Beach, CA 92649

800-633-7246
www.adsenv.com

NCSD-58 (cont'd)

ADS ENVIRONMENTAL SERVICES®

December 22, 2020

Rob Lepore, GISP
Michael K. Nunley & Associates, Inc.
P.O. Box 1604
Arroyo Grande, CA 93421

SUBJECT: Sewer Flow Monitoring 2020, Nipomo, CA Final Report

Dear Mr. Lepore,

ADS is pleased to submit the report for the Nipomo, CA Sewer Flow Monitoring Study completed on behalf of MKN & Associates, Inc. The metering was conducted at three (3) locations. The study was conducted during the period of Friday, October 23, 2020 to Saturday, November 28, 2020.

The report contains depth, velocity, and quantity hydrographs as well as daily long tables for the metering period. An Excel file containing depth, quantity, and velocity entities for the monitoring location in 5-minute format was provided previously.

In addition, we would be happy to further explain any details about the report that may seem unclear. Should you have any questions or comments, you may contact the Project Manager, Paul Mitchell at 714-379.9778.

It has been our pleasure to be of service to you in the performance of this project. Thank you for choosing ADS products and services to meet your flow monitoring needs.

NCSD-58 (cont'd)

Sincerely,
ADS ENVIRONMENTAL SERVICES

Jackie Crutcher
Data Manager

ADS LLC
An IDEX Fluid & Metering Business
Accusonic
ADS Environmental
Services Hydra-Stop

ADS ENVIRONMENTAL SERVICES®

DRAFT

Sewer Flow Monitoring 2020
Nipomo, CA

Prepared For:

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Prepared By:

ADS, LLC
15201 Springdale Street
Huntington Beach, CA 92649

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(cont'd)

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1

Scope and Methodology

Introduction

Michael K. Nunley & Associates, Inc. (mkn) entered into an agreement with ADS Environmental Services to conduct flow monitoring at (3) three locations in the Nipomo, CA Sanitary Collection System. The study was scheduled for a period of (30) thirty calendar days. Seven additional data days have been provided. Once in place, the flow monitoring equipment was be used to measure depth, velocity, and to quantify flows. The objective of this study was to confirm sanitary sewer flows in the monitored locations for planning purposes.

Project Scope

The scope of this study involved using flow monitors to quantify wastewater flow at the designated locations for the 37-day time period. Specifically, the study included the following key components.

- Investigate the proposed flow-monitoring site for adequate hydraulic conditions
- Flow monitor installation
- Flow monitor confirmations and data collections
- Flow data analysis

The monitoring period began on October 23, 2020 and was completed on November 28, 2020. Equipment was removed from the system on December 09, 2020.

Flow Monitoring Equipment

NCSD-58 (cont'd)



The ***ADS FlowShark Triton*** monitor was selected for this project. This flow monitor is an area velocity flow monitor that uses both the Continuity and Manning's equations to measure flow.

The ADS FlowShark Triton monitor consists of data acquisition sensors and a battery-powered microcomputer. The microcomputer includes a processor unit, data storage, and an on-board clock to control and synchronize the sensor recordings. The monitor was programmed to acquire and store depth of flow and velocity readings at 5-minute intervals.

The FS Triton monitor features cross-checking using multiple technologies in each sensor for continuous running of comparisons and tolerances. The FS Triton monitor can support two (2) sets of sensors. The sensor option used for this project was:

The Peak Combo Sensor installed at the bottom of the pipe includes three types of data acquisition technologies.

2

The ***up looking ultrasonic depth*** uses sound waves from two independent transceivers to measure the distance from the sensor upward toward the flow surface; applying the speed of sound in the water and the temperature measured by sensor to calculate depth.

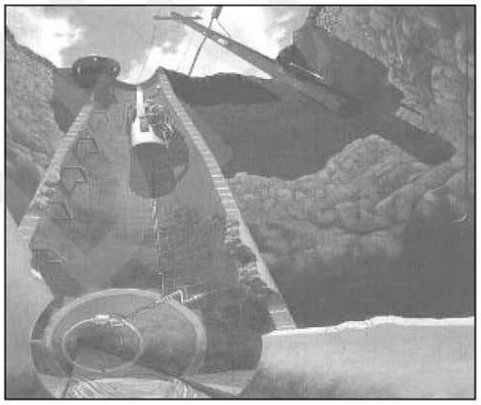
The ***pressure depth*** is calculated by using a piezo-resistive crystal to determine the difference between hydrostatic and atmospheric pressure. The pressure sensor is temperature compensated and vented to the atmosphere through a desiccant filled breather tube.

To obtain ***peak velocity,*** the sensor sends an ultrasonic signal at an angle upward through the widest cross-section of the oncoming flow. The signal is reflected by suspended particles, air bubbles, or organic matter with a frequency shift proportional to the velocity of the reflecting objects. The reflected signal is received by the sensor and processed using digital spectrum analysis to determine the peak flow velocity.

Installation

Installation of flow monitoring equipment typically proceeds in four steps. First, the site is investigated for safety and to determine physical and hydraulic suitability for the flow monitoring equipment. Second, the equipment is physically installed at the selected location. Third, the monitor is tested to assure proper operation of the velocity and depth of flow sensors and verify that the monitor clock is operational and synchronized to the master computer clock. Fourth, the depth and velocity sensors are confirmed and line confirmations are performed.

In pipes up to 42 inches in diameter, the sensors were mounted on expandable stainless-steel rings, inserted at least a foot upstream into influent pipes and tightened against the inside walls of the pipes. Influent pipe installations reduce the influences of turbulence and backwater often caused by changes in channel geometry in manholes.



NCSD-58
(cont'd)

3



Data Collection, Confirmation, and Quality Assurance

Data collects were done remotely via wireless connect on a weekly basis. As needed, during the monitoring period, field crews visit each monitoring location to verify proper monitor operation and document field conditions. The following quality assurance steps are taken to assure the integrity of the collected data:

Measure power supplies: monitors were powered by dry cell battery packs. Voltages were recorded and battery packs replaced, as necessary. Separate batteries provided back-up power to memory allowing primary batteries to be replaced without loss of data.

Clock synchronization: Field crews synchronized monitor clocks to master clocks.

Confirm depth and velocity readings: Field crews descended into meter manholes to manually measure depths and velocities and compare them meter readings to confirm that they agreed. They also measured silt levels, if any, in the inverts of the pipes. Silt areas were subtracted from flow areas to compute true areas of flow.

Confirm average velocities through cross-sectional velocity profiles: Since ADS velocity sensors measure peak velocity, field crews collected cross-sectional velocity profiles in order to develop a relationship between peak and average velocity in lines that meet the hydraulic criteria.

Upload and Review Data: Data collected from the monitors were uploaded and reviewed by a Data Analyst for completeness, outliers and deviations in the flow patterns, which indicate system anomalies or equipment failure.

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Flow Quantification Methods

There are two main equations used to measure open channel flow: the ***Continuity Equation*** and the ***Manning Equation.*** The Continuity Equation, which is considered the most accurate, can be used if both depth of flow and velocity are available. In cases where velocity measurements are not available or not practical to obtain, the Manning Equation can be used to estimate velocity from the depth data based on certain physical characteristics of the pipe (i.e. the slope and roughness of the pipe being measured). However, the Manning equation assumes uniform, steady flow hydraulic conditions with non-varying roughness, which are typically invalid assumptions in most sanitary sewers. The Continuity Equation was used exclusively for this study.

Continuity Equation
The Continuity Equation states that the flow quantity (Q) is equal to the wetted area (A) multiplied by the average velocity (V) of the flow.

4

Q = A * V

This equation is applicable in a variety of conditions including backwater, surcharge, and reverse flow.

Data Analysis and Presentation

Data Analysis

A flow monitor is typically programmed to collect data at 5-minute intervals throughout the monitoring period. The monitor stores raw data consisting of (1) the ultrasonic depth, (2) the peak velocity and (3) the pressure depth. The data is imported into ADS's proprietary software and is examined by a data analyst to verify its integrity. The data analyst also reviews the daily field reports and site visit records to identify conditions that would affect the collected data.

Velocity profiles and the line confirmation data developed by the field personnel are reviewed by the data analyst to identify inconsistencies and verify data integrity. Velocity profiles are reviewed and an average to peak velocity ratio is calculated for the site. This ratio is used in converting the peak velocity measured by the sensor to the average velocity used in the Continuity equation. The data analyst selects which depth sensor entity will be used to calculate the final depth information. Silt levels present at each site visit are reviewed and representative silt levels established.

Occasionally the velocity sensor's performance may be compromised resulting in invalid readings sporadically during the monitoring period. This is generally caused by excessive debris (silt) blocking the sensor's crystals, shallow flows (~< 1") that may drop below the top of the sensor or very clear flows lacking the particles needed to measure rate. In order to use the Continuity equation to quantify the flow during these periods, a Data Analyst and/or Engineer will use the site's historical pipe curve (depth vs. velocity) data along with valid field confirmations to reconstitute and replace the false velocity recordings with expected velocity readings for a given historical depth along the curve.

Selections for the above parameters can be constant or can change during the monitoring period. While the data analysis process is described in a linear manner, it often requires an iterative approach to accurately complete.

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(cont'd)

Data Presentation

This type of flow monitoring project generates a large volume of data. To facilitate review of the data, results have been provided in graphical and tabular formats. The flow data is presented graphically in the form of scattergraphs and hydrographs. Hydrographs are based on 5-minute averaging. Tables are provided in daily average format. These tables show the flow rate for each day, along with the daily minimum and maximums, the times they were observed, the total daily flow, and total flow for the month (or monitoring period). The following explanation of terms may aid in interpretation of the flow data table and hydrograph.

DEPTH - Final calculated depth measurement (in inches)

QUANTITY - Final calculated flow rate (in MGD)

VELOCITY - Final calculated flow velocity (in feet per second)

REPORT TOTAL - Total volume of flow recorded for the indicated time period (in MG)

5

FM01altB

Site Commentary

SITE INFORMATION

Pipe	Round (23.38 in H)
Silt	0.00 (in)

OVERVIEW

FM01altB functioned under normal conditions during the period Friday, October 23, 2020 to Saturday, November 28, 2020. The flow pattern at this site exhibits frequent changes in both depth and velocity throughout the day. The saw-toothed like pattern indicates the influence of pump station activity. Review of the Scattergraph shows that free flow conditions were maintained throughout the monitoring period. No surcharge conditions were recorded. Flow in this line is subcritical.

Flow depth and velocity measurements recorded by the flow monitor are consistent with field confirmations conducted and support the relative accuracy of the flow monitor at this location.

Site FM01altB was positioned downstream of FM02 and FM03. A flow balancing check was completed, and no problems were noted. An average net flow of 0.295 mgd was reported for the study period.

OBSERVATIONS

Average flow depth, velocity, and quantity data observed during **Friday, October 23, 2020 to Saturday, November 28, 2020**, along with observed minimum and maximum data, are provided in the following table.

Observed Flow Conditions			
Item	**DFINAL (in)**	**VFINAL (ft/s)**	**QFINAL (MGD - Total MG)**
Average	4.75	1.87	0.560
Minimum	2.23	0.97	0.100
Maximum	7.11	2.68	1.261
Min Time	11/22/2020 05:10:00	10/23/2020 03:00:00	10/23/2020 03:00:00
Max Time	11/26/2020 11:00:00	11/24/2020 08:25:00	11/08/2020 10:20:00

Based upon the quality and consistency of the observed flow depth and velocity data, the Continuity equation was used to calculate flow rate and quantities during the monitoring period.

Values in the Observed Flow Conditions and data on the graphical reports are based on the five-minute average.

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NCSD-58 (cont'd)

6

DATA UPTIME

Data uptime observed during **Friday, October 23, 2020 to Saturday, November 28, 2020** is provided in the following table:

Percent Uptime	
DFINAL (in)	100
VFINAL (ft/s)	100
QFINAL (MGD - Total MG)	100

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NCSD-58
(cont'd)

ADS ENVIRONMENTAL SERVICES® **ADS Site Report** **Quality Form**

Project Name:	Nipomo MKN TFM 2020	**City:** Nipomo	**Agency:** Nipomo	**FM Initials:** SK	
Site Name:	FM01	**Install Date:** 10/22/20	**Monitor Type**	Peak Doppler	
Address/Location:	509 Southland St (Located on Old Windmill Pl)		**Monitor Model**	Triton +	
			Data Acquisition	Manual/Wireless Collect	
			Manhole ID		
Access: Drive	**Type of System:** Sanitary [X] Storm [ ] Combined [ ]		**Pipe Height:**	23.38 "	
			Pipe Width:	23.38 "	





Investigation Information:

Date/Time of Investigation:	10/22/20 @02:20pm
Site Hydraulics:	Good straight through flow
Upstream Input: (L/S, P/S)	--
Upstream Manhole:	Not Investigated
Downstream Manhole:	Not investigated
Depth of Flow:	4.75 " +/- 0.25"
Range (Air DOF):	+/-
Peak Velocity:	2.10 fps
Silt:	0.00 Inches

Manhole Information:

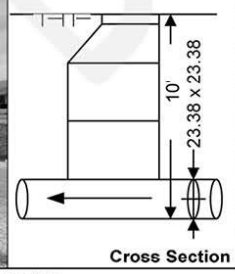
Manhole Depth:	10				
Manhole Material / Condition	Precast/Good				
Pipe Material / Condition:	VCP/Good				
Land Use:	Residential [ ]	Commercial [ ]	Industrial [X]	Trunk [ ]	
Oxygen: 20.9	**H2S:** 0	**LEL:** 0	**CO:** 0		

Safety Notes:
2 man crew required and one blower is to be operated at all times.

NCSD-58 (cont'd)

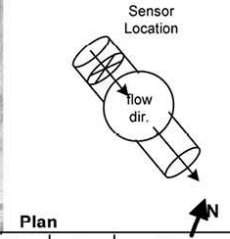
Other Information:





Cross Section



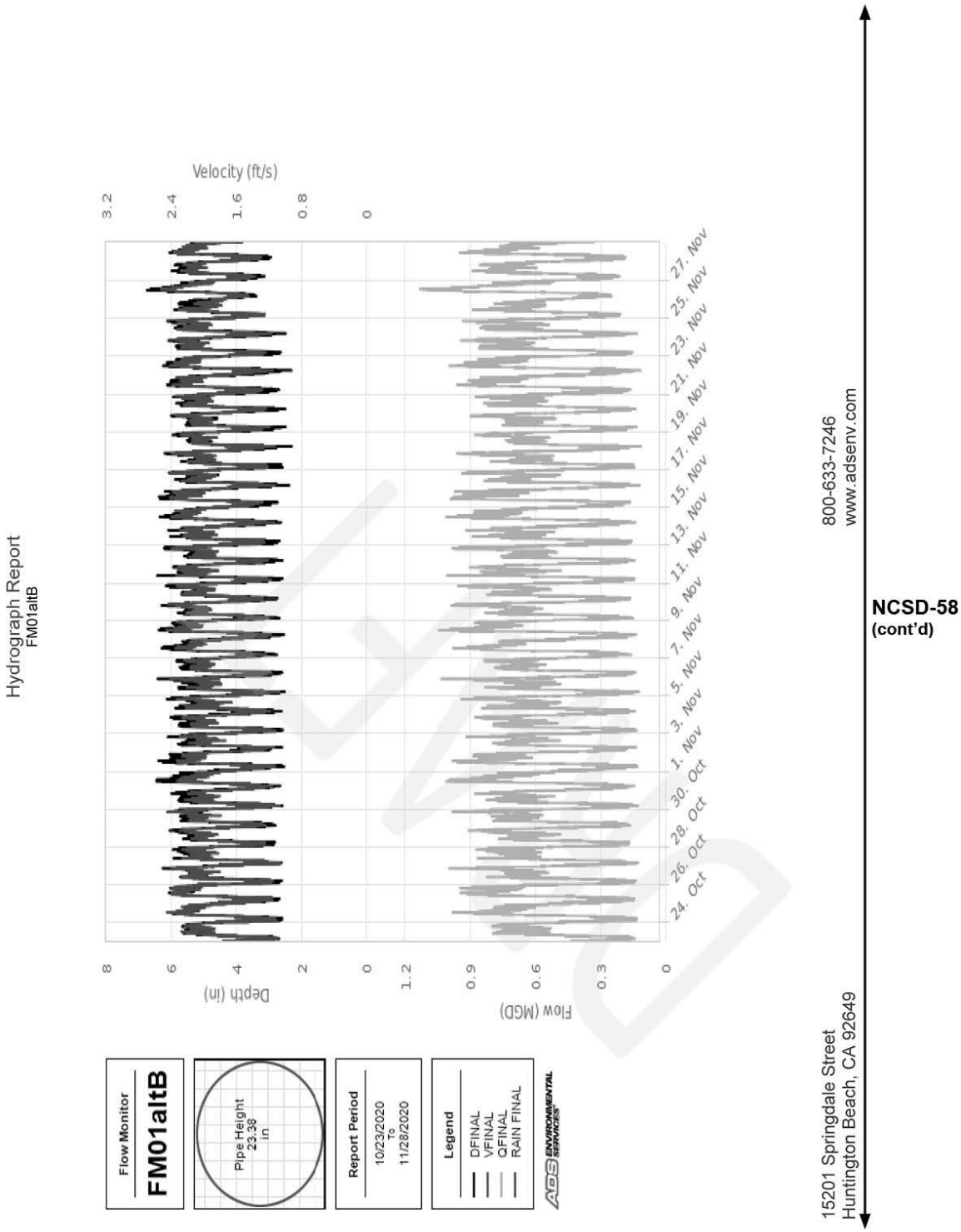


Plan

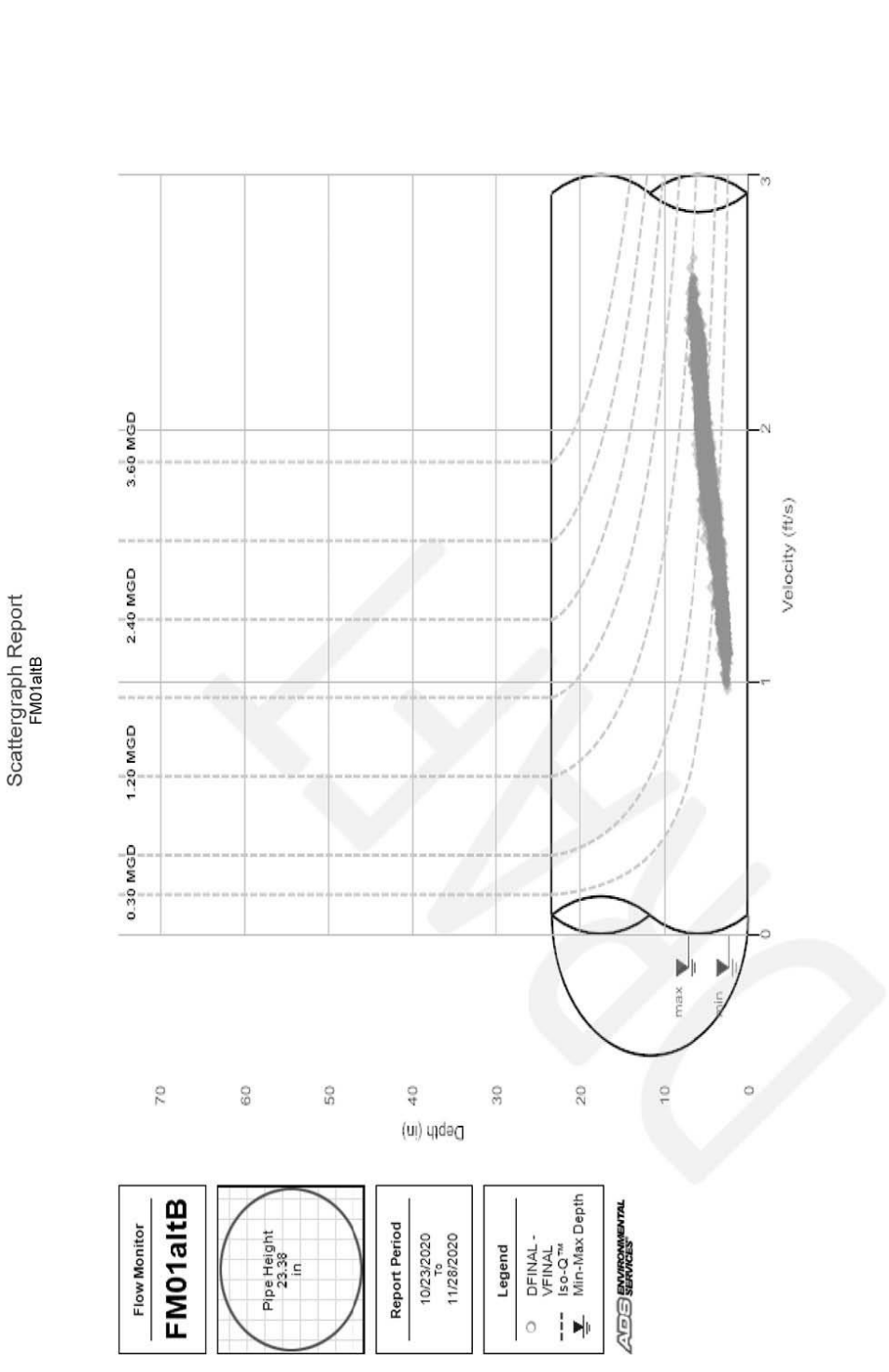
Installation Information		Backup	Yes	No	?	Distance
Installation Type:	Standard	Trunk	[ ]	[x]	[ ]	
Sensors Devices:	Ultrasonic/Velocity/Pressure	Lift / Pump Station	[ ]	[x]	[ ]	
Surcharge Height:	0	WWTP	[ ]	[x]	[ ]	
Rain Gauge Zone:		Other	[ ]	[X]	[ ]	

Additional Site Information / Comments:

Standard Traffic Control with No Safety Concerns



NCSD-58
(cont'd)



NCSD-58
(cont'd)

10

Daily Tabular Report

10/23/2020 00:00 - 11/28/2020 23:59
FM01altBPipe: Round (23.38 in H), Silt0.00 in

	DFINAL (in)					VFINAL (ft/s)					QFINAL (MGD - Total MG)						Rain (in)	RAIN FINAL (in)					
Date	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Total	Total						
10/23/2020	03:05	2.37	20:35	6.10	4.61	03:00	0.97	09:30	2.47	1.84	03:00	0.100	09:30	0.963	0.526	0.526	-	-	-	-	-	-	-
10/24/2020	05:15	2.50	12:05	6.46	4.64	01:55	1.08	13:55	2.50	1.88	01:55	0.122	12:05	1.081	0.552	0.552	-	-	-	-	-	-	-
10/25/2020	05:15	2.53	11:10	6.68	4.77	06:45	1.11	11:15	2.58	1.92	05:15	0.128	11:10	1.165	0.586	0.586	-	-	-	-	-	-	-
10/26/2020	04:15	2.52	20:20	6.58	4.66	01:50	1.11	20:20	2.54	1.87	04:15	0.124	20:20	1.129	0.544	0.544	-	-	-	-	-	-	-
10/27/2020	02:05	2.49	22:00	6.27	4.76	02:05	1.01	22:00	2.38	1.85	02:05	0.111	22:00	0.990	0.555	0.555	-	-	-	-	-	-	-
10/28/2020	03:05	2.62	21:25	6.43	4.74	03:05	1.17	21:25	2.44	1.87	03:05	0.138	21:25	1.052	0.554	0.554	-	-	-	-	-	-	-
10/29/2020	02:30	2.67	19:35	6.56	4.75	02:30	1.19	19:35	2.56	1.90	02:30	0.145	19:35	1.132	0.562	0.562	-	-	-	-	-	-	-
10/30/2020	03:40	2.46	19:20	6.78	4.77	03:40	1.00	19:20	2.52	1.80	03:40	0.108	19:20	1.169	0.540	0.540	-	-	-	-	-	-	-
10/31/2020	05:10	2.57	11:25	6.95	4.83	03:45	1.13	09:50	2.54	1.83	05:10	0.132	09:50	1.216	0.565	0.565	-	-	-	-	-	-	-
11/01/2020	05:30	2.39	12:30	6.67	4.84	06:40	1.05	12:30	2.47	1.85	05:25	0.114	12:30	1.118	0.576	0.576	-	-	-	-	-	-	-
11/02/2020	05:35	2.46	17:25	6.33	4.73	05:35	1.01	10:50	2.37	1.79	05:35	0.109	17:25	0.978	0.532	0.532	-	-	-	-	-	-	-
11/03/2020	04:00	2.45	18:25	6.52	4.75	02:40	1.08	18:25	2.38	1.83	02:40	0.117	18:25	1.047	0.546	0.546	-	-	-	-	-	-	-
11/04/2020	03:20	2.53	20:30	6.50	4.74	02:30	1.08	19:10	2.45	1.82	02:30	0.122	19:10	1.059	0.541	0.541	-	-	-	-	-	-	-
11/05/2020	04:00	2.41	20:30	6.72	4.70	04:20	1.00	10:00	2.47	1.82	04:20	0.109	20:30	1.117	0.535	0.535	-	-	-	-	-	-	-
11/06/2020	04:45	2.42	19:45	6.52	4.72	04:45	1.14	19:45	2.38	1.84	04:45	0.121	19:45	1.044	0.541	0.541	-	-	-	-	-	-	-
11/07/2020	03:10	2.60	13:45	6.71	4.82	03:40	1.16	11:45	2.40	1.88	03:10	0.138	13:45	1.033	0.573	0.573	-	-	-	-	-	-	-
11/08/2020	04:55	2.42	10:20	6.93	4.87	01:40	1.04	10:20	2.64	1.90	04:55	0.120	10:20	1.261	0.597	0.597	-	-	-	-	-	-	-
11/09/2020	04:20	2.51	18:45	6.80	4.79	01:50	1.17	20:05	2.55	1.88	04:20	0.130	20:05	1.172	0.568	0.568	-	-	-	-	-	-	-
11/10/2020	04:20	2.37	20:30	6.74	4.73	04:20	1.17	19:45	2.51	1.87	04:20	0.120	19:45	1.131	0.553	0.553	-	-	-	-	-	-	-
11/11/2020	04:55	2.48	08:35	6.66	4.73	03:05	1.12	19:25	2.58	1.89	04:50	0.131	19:25	1.149	0.561	0.561	-	-	-	-	-	-	-
11/12/2020	04:10	2.49	18:15	6.69	4.70	04:10	1.18	18:15	2.54	1.88	04:10	0.130	18:15	1.155	0.551	0.551	-	-	-	-	-	-	-
11/13/2020	04:45	2.55	18:35	6.57	4.71	00:55	1.14	10:30	2.45	1.88	04:45	0.132	18:35	1.071	0.550	0.550	-	-	-	-	-	-	-
11/14/2020	04:25	2.52	14:45	6.68	4.81	04:20	1.08	11:55	2.60	1.90	04:25	0.121	11:55	1.137	0.580	0.580	-	-	-	-	-	-	-
11/15/2020	06:25	2.57	12:10	6.85	4.83	06:00	1.19	11:00	2.59	1.93	06:30	0.142	12:10	1.166	0.597	0.597	-	-	-	-	-	-	-
11/16/2020	03:25	2.27	16:20	6.57	4.70	03:50	1.08	19:40	2.49	1.89	03:55	0.107	19:15	1.054	0.553	0.553	-	-	-	-	-	-	-
11/17/2020	04:20	2.52	20:40	6.56	4.66	02:10	1.17	20:40	2.55	1.88	02:10	0.133	20:40	1.132	0.546	0.546	-	-	-	-	-	-	-
11/18/2020	04:40	2.27	19:10	6.20	4.67	05:00	1.09	18:55	2.38	1.87	04:35	0.107	19:10	0.950	0.545	0.545	-	-	-	-	-	-	-
11/19/2020	05:10	2.40	18:25	6.50	4.69	03:05	1.13	18:25	2.54	1.89	05:10	0.122	18:25	1.111	0.551	0.551	-	-	-	-	-	-	-
11/20/2020	04:00	2.45	11:20	6.46	4.64	04:00	1.14	20:35	2.43	1.87	04:00	0.122	11:20	1.046	0.538	0.538	-	-	-	-	-	-	-
11/21/2020	04:40	2.51	09:15	6.47	4.72	05:45	1.19	09:15	2.59	1.90	05:45	0.134	09:15	1.125	0.569	0.569	-	-	-	-	-	-	-
11/22/2020	05:10	2.23	14:45	6.55	4.74	05:10	1.11	11:30	2.59	1.92	05:10	0.104	11:30	1.108	0.584	0.584	-	-	-	-	-	-	-
11/23/2020	04:10	2.58	17:45	6.42	4.69	03:50	1.18	19:40	2.54	1.91	02:45	0.140	19:40	1.078	0.562	0.562	-	-	-	-	-	-	-
11/24/2020	04:25	2.40	08:25	6.47	4.71	04:25	1.15	08:25	2.68	1.92	04:25	0.120	08:25	1.165	0.563	0.563	-	-	-	-	-	-	-
11/25/2020	02:30	3.14	11:40	6.36	4.84	04:55	1.15	10:20	2.47	1.82	04:55	0.182	18:10	1.009	0.548	0.548	-	-	-	-	-	-	-
11/26/2020	05:50	3.14	11:00	7.11	5.08	05:50	1.36	12:15	2.57	1.99	05:50	0.211	11:00	1.208	0.648	0.648	-	-	-	-	-	-	-
11/27/2020	04:50	2.99	10:55	6.45	4.83	04:50	1.31	10:55	2.45	1.90	04:50	0.189	10:55	1.062	0.573	0.573	-	-	-	-	-	-	-
11/28/2020	04:30	2.80	10:50	6.43	4.71	04:30	1.24	10:50	2.53	1.90	04:30	0.162	10:55	1.091	0.557	0.557	-	-	-	-	-	-	-

10/23/2020 00:00 - 11/28/2020 23:59

	DFINAL (in)	VFINAL (ft/s)	QFINAL (MGD - Total MG)	Rain (in)
Total			20.721	
Average	4.75	1.87	0.560	

NCSD-58 (cont'd)

FM02

Site Commentary

SITE INFORMATION

Pipe	Elliptical (12.5 in H x 12.75 in W)
Silt	0.00 (in)

OVERVIEW

FM02 functioned under normal conditions during the period Friday, October 23, 2020 to Saturday, November 28, 2020. The flow pattern at this site exhibits frequent changes in both depth and velocity throughout the day. The saw-toothed like pattern indicates the influence of pump station activity. Review of the Scattergraph shows that although this line was impacted by debris, free flow conditions were maintained throughout the monitoring period. No surcharge conditions were recorded. Flow in this line is subcritical.

Flow depth and velocity measurements recorded by the flow monitor are consistent with field confirmations conducted and support the relative accuracy of the flow monitor at this location.

Site FM02 along with FM03 was positioned upstream of FM01altB. (See FM01altB Site Commentary for Balancing Details).

OBSERVATIONS

Average flow depth, velocity, and quantity data observed during **Friday, October 23, 2020 to Saturday, November 28, 2020**, along with observed minimum and maximum data, are provided in the following table.

NCSD-58 (cont'd)

Observed Flow Conditions			
Item	**DFINAL (in)**	**VFINAL (ft/s)**	**QFINAL (MGD - Total MG)**
Average	2.95	1.42	0.191
Minimum	1.13	0.21	0.007
Maximum	6.74	3.00	0.926
Min Time	11/15/2020 04:40:00	11/26/2020 05:10:00	10/26/2020 03:55:00
Max Time	11/24/2020 08:05:00	11/24/2020 08:05:00	11/24/2020 08:05:00

Based upon the quality and consistency of the observed flow depth and velocity data, the Continuity equation was used to calculate flow rate and quantities during the monitoring period.

Values in the Observed Flow Conditions and data on the graphical reports are based on the five-minute average.

DRAFT

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DATA UPTIME

Data uptime observed during **Friday, October 23, 2020 to Saturday, November 28, 2020** is provided in the following table:

Percent Uptime	
DFINAL (in)	100
VFINAL (ft/s)	100
QFINAL (MGD - Total MG)	100

DRAFT

NCSD-58
(cont'd)

ADS ENVIRONMENTAL SERVICES® **ADS Site Report** **Quality Form**

Project Name:	Nipomo MKN TFM 2020	**City:** Nipomo	**Agency:** Nipomo	**FM Initials:** SK	
Site Name:	FM02	**Install Date:** 10/22/20	**Monitor Type**	Peak Doppler	
Address/Location:	525 S Oak Glen		**Monitor Model**	Triton +	
			Data Acquisition	Manual/Wireless Collect	
			Manhole ID		
Access: Drive	**Type of System:**	Sanitary [X] Storm [ ] Combined [ ]	**Pipe Height:**	12.50 "	
			Pipe Width:	12.75 "	



Investigation Information:

Date/Time of Investigation:	10/22/20 @03:35pm
Site Hydraulics:	Good straight through flow
Upstream Input: (L/S, P/S)	--
Upstream Manhole:	Not Investigated
Downstream Manhole:	Not investigated
Depth of Flow:	3.25 " +/- 0.25"
Range (Air DOF):	+/-
Peak Velocity:	2.10 fps
Silt:	0.00 Inches

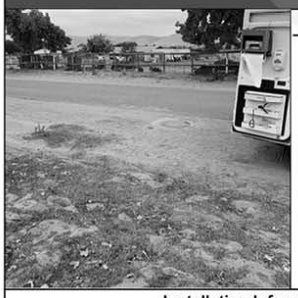
Manhole Information:

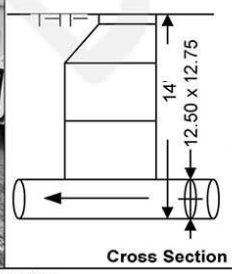
Manhole Depth:	14'				
Manhole Material / Condition	Precast/Good				
Pipe Material / Condition:	VCP/Good				
Land Use:	Residential [x]	Commercial [ ]	Industrial [ ]	Trunk [ ]	
Oxygen: 20.9	**H2S:** 0	**LEL:** 0	**CO:** 0		

Safety Notes:
2 man crew required and one blower is to be operated at all times.

NCSD-58 (cont'd)

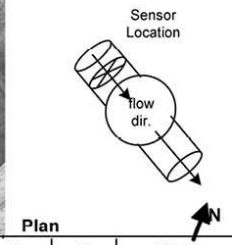
Other Information:





Cross Section



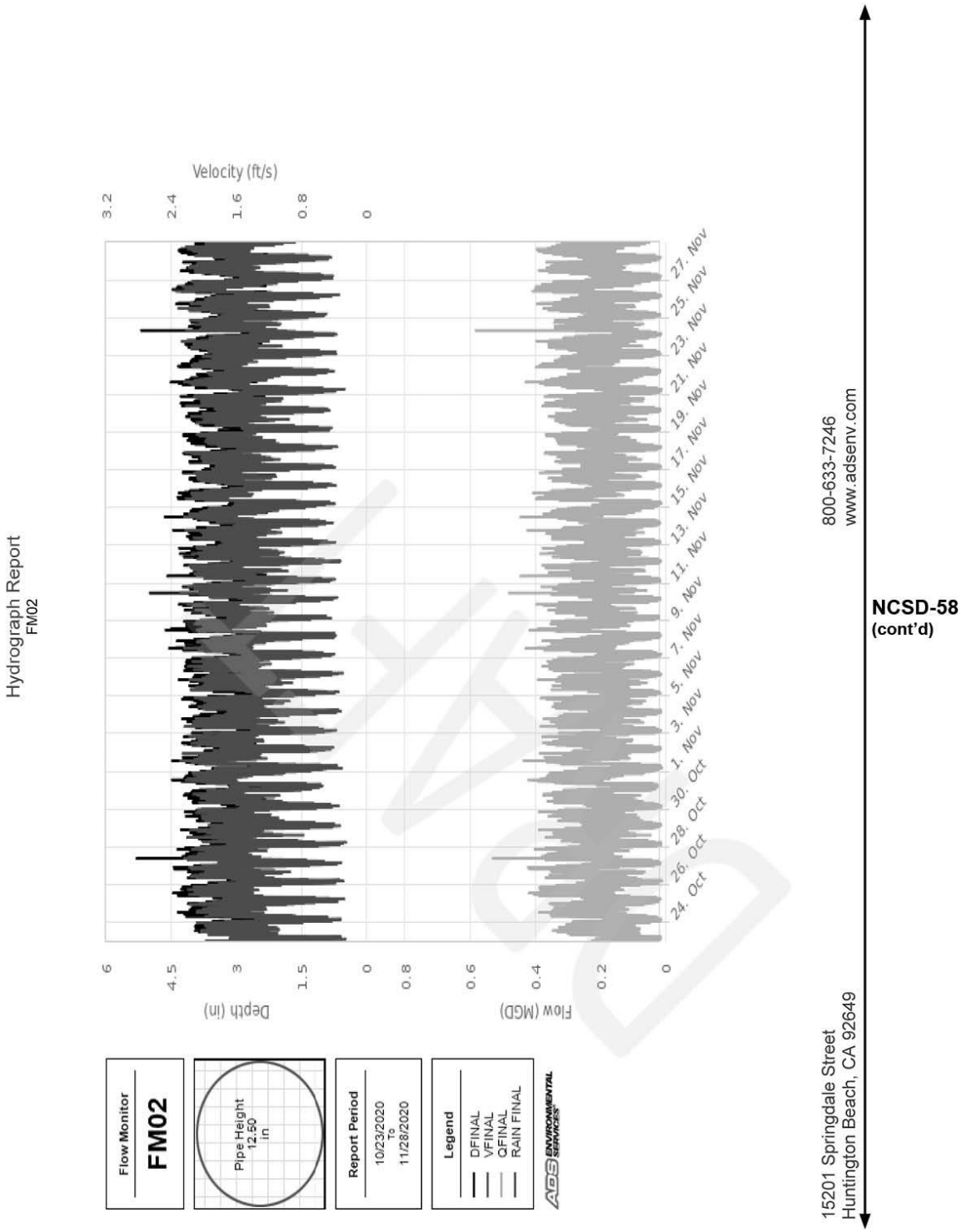


Plan

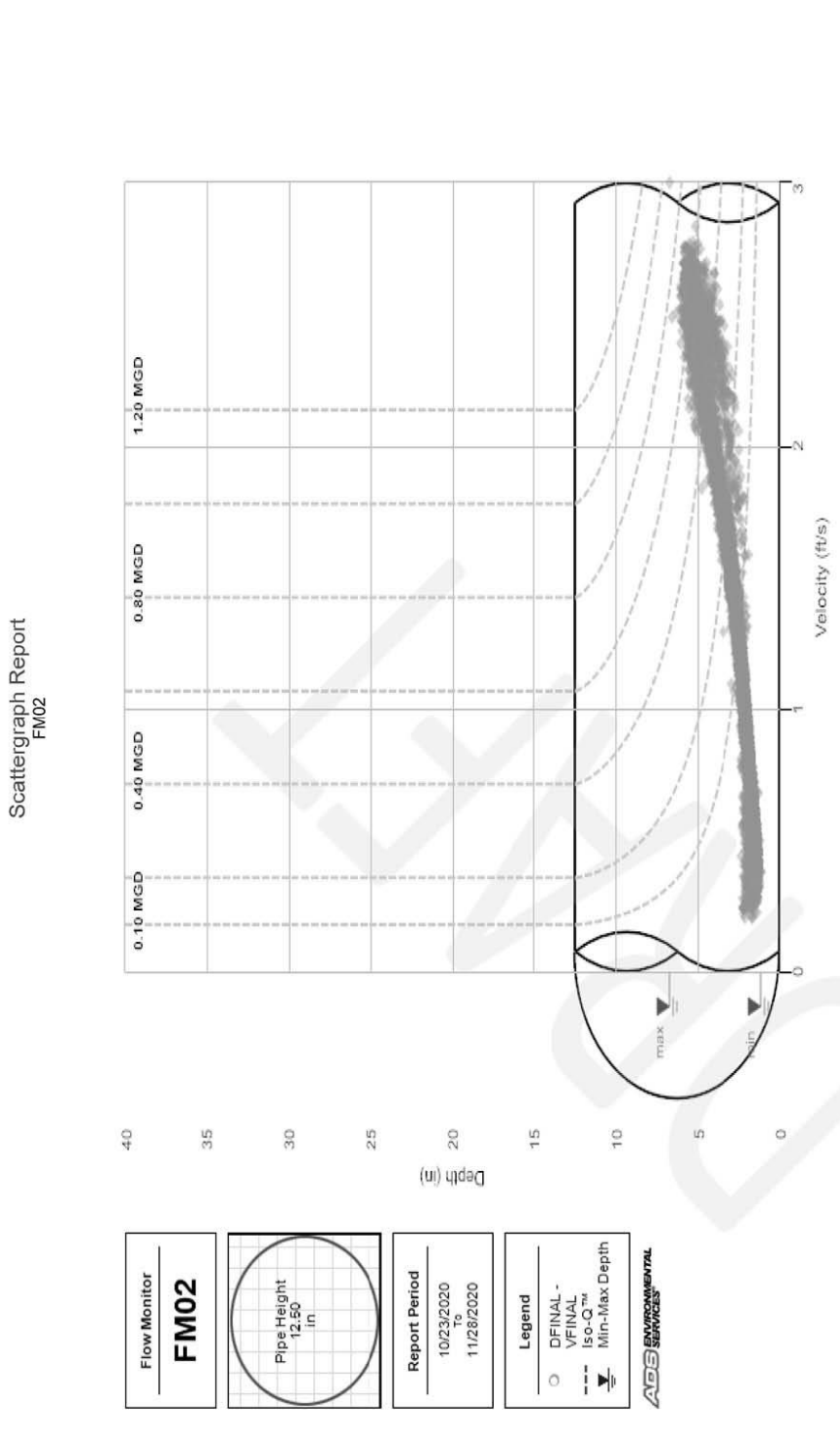
Installation Information		Backup	Yes	No	?	Distance
Installation Type:	Standard	Trunk	[ ]	[x]	[ ]	
Sensors Devices:	Ultrasonic/Velocity/Pressure	Lift / Pump Station	[ ]	[x]	[ ]	
Surcharge Height:	0	WWTP	[ ]	[x]	[ ]	
Rain Gauge Zone:		Other	[ ]	[X]	[ ]	

Additional Site Information / Comments:

Standard Traffic Control with No Safety Concerns



NCSD-58
(cont'd)



NCSD-58
(cont'd)

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Daily Tabular Report

10/23/2020 00:00 - 11/28/2020 23:59
FM02Pipe: Elliptical (12.5 in H x 12.75 in W), Silt0.00 in

	DFINAL (in)					VFINAL (ft/s)					QFINAL (MGD - Total MG)						Rain (in)	RAIN FINAL (in)					
Date	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Total	Total						
10/23/2020	04:00	1.47	12:45	5.41	2.81	02:20	0.21	12:45	2.70	1.35	04:00	0.012	12:45	0.629	0.166	0.166	-	-	-	-	-	-	-
10/24/2020	01:25	1.41	13:35	5.97	3.00	04:00	0.23	12:55	2.71	1.38	03:55	0.009	13:35	0.689	0.192	0.192	-	-	-	-	-	-	-
10/25/2020	06:15	1.42	12:20	6.09	3.15	05:15	0.22	19:50	2.76	1.45	05:15	0.010	12:20	0.699	0.213	0.213	-	-	-	-	-	-	-
10/26/2020	04:05	1.27	19:40	6.04	2.98	03:55	0.23	18:45	2.76	1.40	03:55	0.007	18:45	0.705	0.194	0.194	-	-	-	-	-	-	-
10/27/2020	05:35	1.47	08:40	6.28	3.14	03:25	0.25	08:25	2.84	1.46	02:00	0.012	08:40	0.710	0.212	0.212	-	-	-	-	-	-	-
10/28/2020	02:30	1.38	20:10	5.82	2.99	05:10	0.21	11:00	2.70	1.38	02:30	0.009	20:10	0.644	0.189	0.189	-	-	-	-	-	-	-
10/29/2020	04:35	1.31	19:50	5.87	2.96	01:55	0.31	19:50	2.70	1.41	04:30	0.012	19:50	0.700	0.189	0.189	-	-	-	-	-	-	-
10/30/2020	02:35	1.27	20:55	5.93	2.90	03:10	0.31	18:40	2.75	1.38	03:05	0.010	20:55	0.694	0.184	0.184	-	-	-	-	-	-	-
10/31/2020	01:50	1.50	09:10	5.96	3.02	23:40	0.36	10:45	2.78	1.47	04:25	0.019	11:20	0.682	0.203	0.203	-	-	-	-	-	-	-
11/01/2020	04:55	1.31	10:05	5.93	2.93	03:30	0.29	08:05	2.74	1.42	03:30	0.009	13:45	0.672	0.192	0.192	-	-	-	-	-	-	-
11/02/2020	03:10	1.27	09:50	5.51	2.92	05:30	0.36	12:50	2.74	1.42	03:10	0.012	14:55	0.634	0.188	0.188	-	-	-	-	-	-	-
11/03/2020	03:20	1.24	18:05	6.04	2.88	03:35	0.35	08:05	2.67	1.40	03:25	0.011	18:05	0.703	0.184	0.184	-	-	-	-	-	-	-
11/04/2020	04:30	1.32	20:05	5.61	2.88	03:10	0.29	20:05	2.66	1.37	03:10	0.010	20:05	0.648	0.180	0.180	-	-	-	-	-	-	-
11/05/2020	02:30	1.30	13:10	5.53	2.91	04:00	0.28	08:10	2.59	1.36	02:30	0.010	19:50	0.609	0.177	0.177	-	-	-	-	-	-	-
11/06/2020	02:35	1.34	10:50	5.72	2.99	04:00	0.24	10:50	2.66	1.40	02:20	0.011	10:50	0.666	0.190	0.190	-	-	-	-	-	-	-
11/07/2020	03:15	1.28	09:25	5.86	3.09	03:20	0.31	11:35	2.72	1.45	03:15	0.010	12:50	0.672	0.204	0.204	-	-	-	-	-	-	-
11/08/2020	03:40	1.39	11:05	5.95	3.09	03:50	0.30	10:15	2.66	1.41	03:50	0.011	10:15	0.679	0.200	0.200	-	-	-	-	-	-	-
11/09/2020	05:15	1.34	18:10	5.81	3.00	01:25	0.35	11:40	2.62	1.47	05:10	0.014	18:10	0.658	0.195	0.195	-	-	-	-	-	-	-
11/10/2020	02:30	1.30	10:45	6.08	2.87	02:25	0.32	07:40	2.66	1.42	02:25	0.011	10:45	0.649	0.181	0.181	-	-	-	-	-	-	-
11/11/2020	01:50	1.25	08:20	5.97	2.92	03:00	0.33	17:50	2.76	1.44	03:00	0.011	17:50	0.690	0.191	0.191	-	-	-	-	-	-	-
11/12/2020	05:20	1.27	19:30	5.69	2.91	02:00	0.30	13:40	2.65	1.43	01:55	0.010	20:10	0.621	0.188	0.188	-	-	-	-	-	-	-
11/13/2020	03:25	1.19	18:30	5.59	2.91	03:20	0.34	18:30	2.75	1.43	03:25	0.009	18:30	0.669	0.187	0.187	-	-	-	-	-	-	-
11/14/2020	05:35	1.36	10:10	5.67	2.96	03:50	0.38	16:05	2.65	1.44	03:50	0.014	11:00	0.634	0.194	0.194	-	-	-	-	-	-	-
11/15/2020	04:40	1.13	17:30	5.86	3.00	05:00	0.30	17:30	2.76	1.46	04:30	0.010	17:30	0.713	0.201	0.201	-	-	-	-	-	-	-
11/16/2020	01:50	1.28	19:15	5.63	2.91	02:55	0.35	19:15	2.75	1.44	02:45	0.012	19:15	0.675	0.188	0.188	-	-	-	-	-	-	-
11/17/2020	03:25	1.26	08:10	5.64	2.92	02:25	0.36	19:25	2.66	1.43	02:25	0.011	19:25	0.633	0.185	0.185	-	-	-	-	-	-	-
11/18/2020	03:50	1.29	12:40	5.66	2.94	04:10	0.32	18:40	2.68	1.42	04:05	0.011	18:40	0.653	0.188	0.188	-	-	-	-	-	-	-
11/19/2020	03:00	1.29	20:05	5.65	2.89	04:25	0.37	11:20	2.63	1.38	03:25	0.013	20:05	0.618	0.178	0.178	-	-	-	-	-	-	-
11/20/2020	01:55	1.28	08:25	5.85	2.91	02:15	0.39	12:00	2.64	1.43	02:05	0.013	12:00	0.668	0.186	0.186	-	-	-	-	-	-	-
11/21/2020	04:05	1.28	12:05	5.79	2.90	05:25	0.25	16:50	2.69	1.41	05:20	0.010	12:05	0.668	0.185	0.185	-	-	-	-	-	-	-
11/22/2020	04:15	1.20	09:00	5.79	2.97	04:15	0.33	09:00	2.76	1.45	04:15	0.009	09:00	0.703	0.197	0.197	-	-	-	-	-	-	-
11/23/2020	02:10	1.37	17:35	5.46	2.94	05:00	0.34	11:10	2.70	1.44	02:10	0.012	17:35	0.611	0.189	0.189	-	-	-	-	-	-	-
11/24/2020	04:20	1.26	08:05	6.74	2.93	02:50	0.33	08:05	3.00	1.44	02:50	0.011	08:05	0.926	0.192	0.192	-	-	-	-	-	-	-
11/25/2020	02:00	1.31	08:55	5.83	2.93	05:10	0.45	08:55	2.74	1.46	05:10	0.014	08:55	0.705	0.194	0.194	-	-	-	-	-	-	-
11/26/2020	02:45	1.28	12:35	5.91	3.00	05:10	0.21	18:30	2.72	1.49	05:10	0.009	12:50	0.683	0.205	0.205	-	-	-	-	-	-	-
11/27/2020	05:05	1.25	12:15	5.90	2.88	01:35	0.27	17:40	2.73	1.42	05:00	0.011	12:15	0.706	0.187	0.187	-	-	-	-	-	-	-
11/28/2020	04:35	1.28	11:45	6.07	3.00	05:45	0.38	13:00	2.77	1.48	04:25	0.012	11:45	0.704	0.202	0.202	-	-	-	-	-	-	-

10/23/2020 00:00 - 11/28/2020 23:59

	DFINAL (in)	VFINAL (ft/s)	QFINAL (MGD - Total MG)	Rain (in)
Total			7.071	
Average	2.95	1.42	0.191	

NCSD-58 (cont'd)

15201 Springdale Street
Huntington Beach, CA 92649

800-633-7246
www.adsenv.com

FM03

Site Commentary

SITE INFORMATION

Pipe	Round (9.88 in H)
Silt	0.00 (in)

OVERVIEW

FM03 functioned under normal conditions during the period Friday, October 23, 2020 to Saturday, November 28, 2020. The flow pattern at this site exhibits frequent changes in both depth and velocity throughout the day. The saw-toothed like pattern indicates the influence of pump station activity. Review of the Scattergraph shows that free flow conditions were maintained throughout the monitoring period. No surcharge conditions were recorded. Flow in this line is subcritical.

Flow depth and velocity measurements recorded by the flow monitor are consistent with field confirmations conducted and support the relative accuracy of the flow monitor at this location.

Site FM03 along with FM02 was positioned upstream of FM01altB. (See FM01altB Site Commentary for Balancing Details).

OBSERVATIONS

Average flow depth, velocity, and quantity data observed during **Friday, October 23, 2020 to Saturday, November 28, 2020**, along with observed minimum and maximum data, are provided in the following table.

Observed Flow Conditions			
Item	**DFINAL (in)**	**VFINAL (ft/s)**	**QFINAL (MGD - Total MG)**
Average	2.25	1.14	0.074
Minimum	0.92	0.31	0.005
Maximum	4.12	1.83	0.248
Min Time	11/13/2020 05:15:00	11/05/2020 04:25:00	11/05/2020 04:25:00
Max Time	11/26/2020 09:55:00	11/26/2020 09:55:00	11/26/2020 09:55:00

Based upon the quality and consistency of the observed flow depth and velocity data, the Continuity equation was used to calculate flow rate and quantities during the monitoring period.

Values in the Observed Flow Conditions and data on the graphical reports are based on the five-minute average.

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DATA UPTIME

Data uptime observed during **Friday, October 23, 2020 to Saturday, November 28, 2020** is provided in the following table:

Percent Uptime	
DFINAL (in)	100
VFINAL (ft/s)	100
QFINAL (MGD - Total MG)	100

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(cont'd)

ADS ENVIRONMENTAL SERVICES® **ADS Site Report** **Quality Form**

Project Name:	Nipomo MKN TFM 2020	**City:** Nipomo	**Agency:** Nipomo	**FM Initials:** SK	
Site Name:	FM03	**Install Date:** 10/22/20	**Monitor Type**	Peak Doppler	
Address/Location:	Frontage Rd & Hill St		**Monitor Model**	Triton +	
			Data Acquisition	Manual/Wireless Collect	
			Manhole ID		
Access: Drive	**Type of System:** Sanitary [X] Storm [ ] Combined [ ]		**Pipe Height:**	10.88 "	
			Pipe Width:	10.63 "	





Investigation Information:

Date/Time of Investigation:	10/22/20 @04:40pm
Site Hydraulics:	Good straight through flow
Upstream Input: (L/S, P/S)	--
Upstream Manhole:	Not Investigated
Downstream Manhole:	Not investigated
Depth of Flow:	2.63 " +/- 0.25"
Range (Air DOF):	+/-
Peak Velocity:	1.54 fps
Silt:	0.00 Inches

Manhole Information:

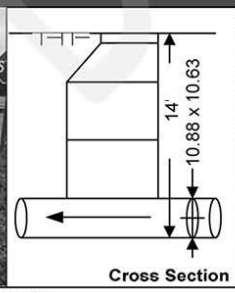
Manhole Depth:	14'				
Manhole Material / Condition	Precast/Good				
Pipe Material / Condition:	VCP/Good				
Land Use:	Residential [X]	Commercial [ ]	Industrial [ ]	Trunk [ ]	
Oxygen: 20.9	**H2S:** 0	**LEL:** 0	**CO:** 0		

Safety Notes:
2 man crew required and one blower is to be operated at all times.

NCSD-58 (cont'd)

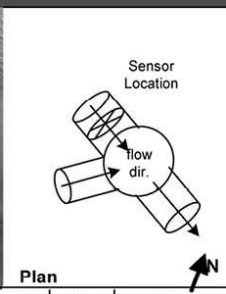
Other Information:





Cross Section





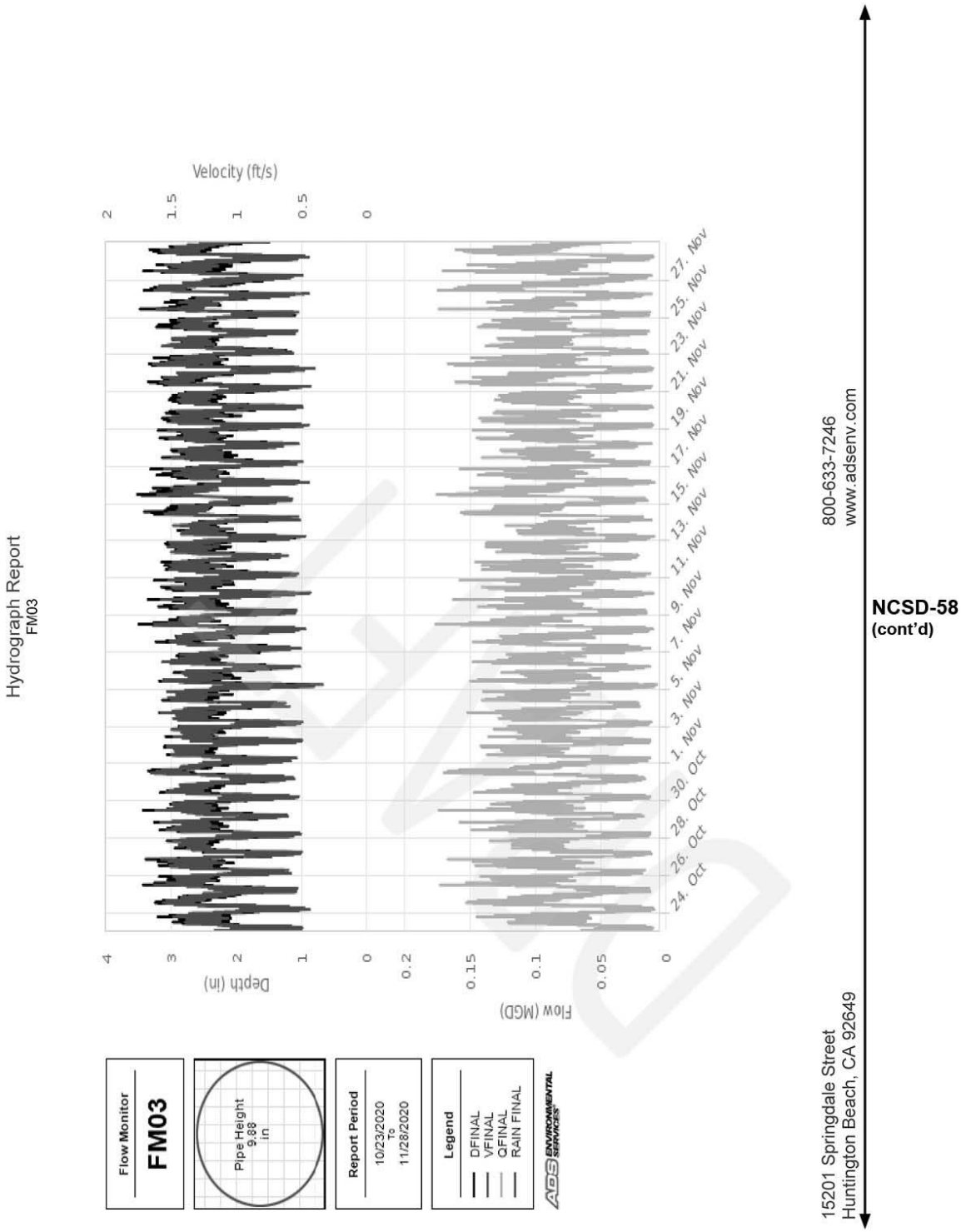
Plan

Installation Information		Backup	Yes	No	?	Distance
Installation Type:	Standard	Trunk	[ ]	[x]	[ ]	
Sensors Devices:	Ultrasonic/Velocity/Pressure	Lift / Pump Station	[ ]	[x]	[ ]	
Surcharge Height:	0	WWTP	[ ]	[x]	[ ]	
Rain Gauge Zone:		Other	[ ]	[X]	[ ]	

Additional Site Information / Comments:

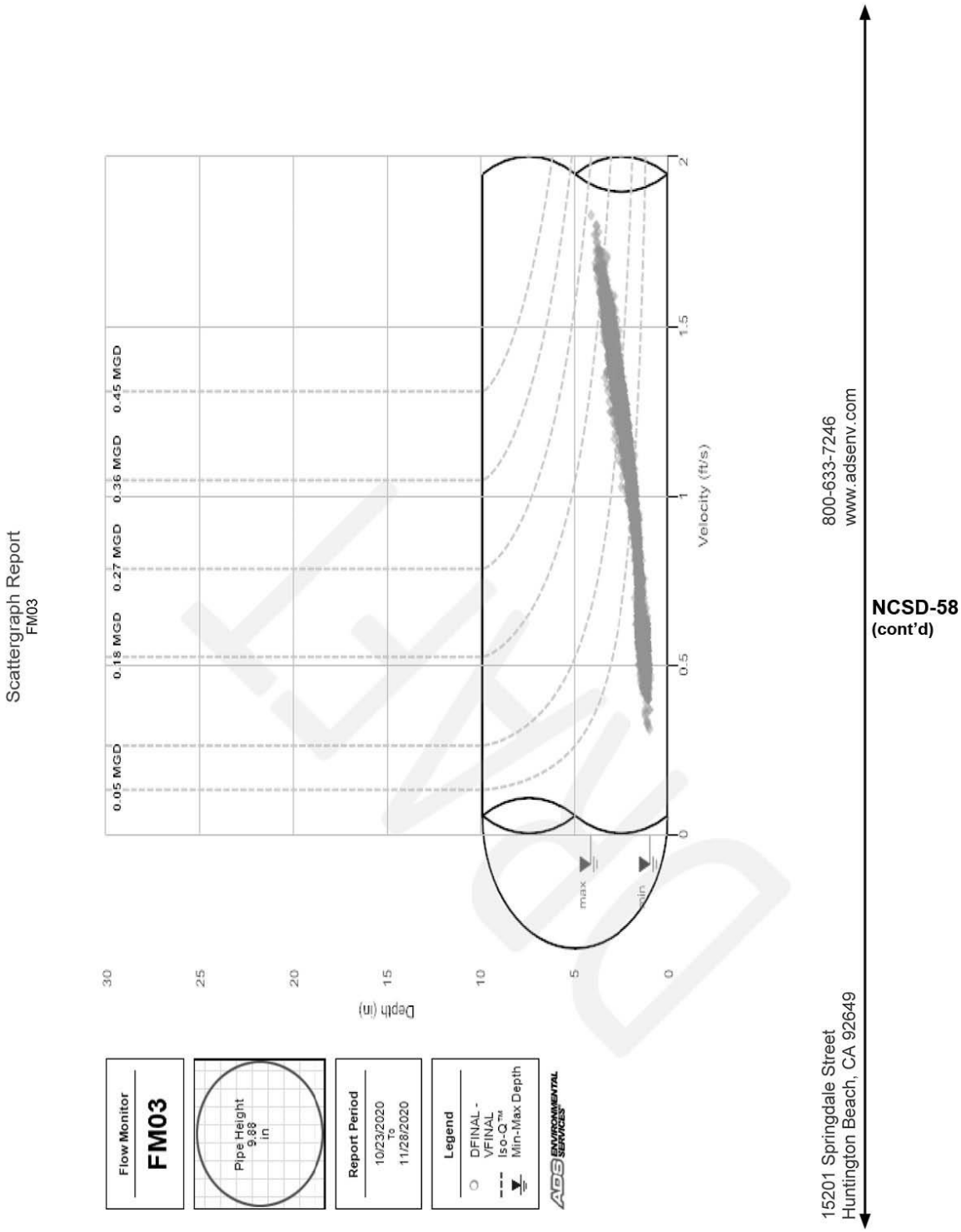
Standard Traffic Control with No Safety Concerns

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(cont'd)

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(cont'd)

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Daily Tabular Report

10/23/2020 00:00 - 11/28/2020 23:59
FM03Pipe: Round (9.88 in H), Silt0.00 in

	DFINAL (in)					VFINAL (ft/s)					QFINAL (MGD - Total MG)						Rain (in)	RAIN FINAL (in)				
Date	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Time	Min	Time	Max	Avg	Total	Total					
10/23/2020	02:30	0.93	08:50	3.54	2.18	02:30	0.37	08:50	1.64	1.10	02:30	0.006	08:50	0.182	0.069	0.069	-	-	-	-	-	-
10/24/2020	02:50	0.99	13:15	3.71	2.21	02:45	0.42	13:15	1.70	1.12	02:25	0.008	13:15	0.201	0.073	0.073	-	-	-	-	-	-
10/25/2020	01:35	1.08	13:05	3.63	2.27	06:45	0.45	10:45	1.72	1.14	03:15	0.010	10:45	0.196	0.076	0.076	-	-	-	-	-	-
10/26/2020	06:10	1.18	19:50	3.83	2.29	23:40	0.54	19:50	1.75	1.16	06:10	0.013	19:50	0.216	0.076	0.076	-	-	-	-	-	-
10/27/2020	02:30	1.04	16:25	3.74	2.27	02:30	0.48	16:25	1.70	1.14	02:30	0.009	16:25	0.203	0.075	0.075	-	-	-	-	-	-
10/28/2020	05:35	1.07	19:30	3.63	2.25	04:30	0.48	19:30	1.72	1.16	05:35	0.010	19:30	0.197	0.075	0.075	-	-	-	-	-	-
10/29/2020	03:10	1.21	10:45	3.83	2.27	03:20	0.57	10:45	1.80	1.18	03:10	0.014	10:45	0.222	0.077	0.077	-	-	-	-	-	-
10/30/2020	02:15	1.08	10:55	3.55	2.23	02:10	0.50	10:55	1.65	1.15	02:15	0.010	10:55	0.184	0.074	0.074	-	-	-	-	-	-
10/31/2020	05:05	1.09	13:45	3.72	2.32	05:05	0.49	11:20	1.78	1.17	05:05	0.010	11:20	0.210	0.080	0.080	-	-	-	-	-	-
11/01/2020	02:35	1.08	10:45	3.67	2.29	06:20	0.51	16:40	1.63	1.17	02:25	0.011	10:45	0.188	0.078	0.078	-	-	-	-	-	-
11/02/2020	03:20	0.97	19:55	3.30	2.22	05:05	0.47	19:50	1.62	1.13	03:20	0.009	19:50	0.162	0.072	0.072	-	-	-	-	-	-
11/03/2020	04:30	1.04	16:45	3.41	2.21	02:30	0.44	16:45	1.66	1.14	02:25	0.009	16:45	0.174	0.072	0.072	-	-	-	-	-	-
11/04/2020	05:20	1.11	10:05	3.51	2.25	04:00	0.52	20:05	1.69	1.16	04:00	0.012	10:05	0.183	0.074	0.074	-	-	-	-	-	-
11/05/2020	04:20	0.96	09:35	3.54	2.16	04:25	0.31	09:35	1.68	1.11	04:25	0.005	09:35	0.186	0.069	0.069	-	-	-	-	-	-
11/06/2020	04:55	1.03	09:50	3.49	2.24	03:45	0.48	09:50	1.72	1.15	03:45	0.010	09:50	0.187	0.074	0.074	-	-	-	-	-	-
11/07/2020	03:30	1.13	09:55	3.58	2.24	03:45	0.47	09:55	1.72	1.15	03:30	0.011	09:55	0.194	0.074	0.074	-	-	-	-	-	-
11/08/2020	04:10	1.02	13:40	3.80	2.27	04:25	0.45	13:40	1.72	1.14	02:50	0.009	13:40	0.210	0.076	0.076	-	-	-	-	-	-
11/09/2020	00:30	1.04	19:30	3.55	2.24	04:00	0.43	19:30	1.65	1.13	04:00	0.009	19:30	0.183	0.072	0.072	-	-	-	-	-	-
11/10/2020	03:55	1.02	20:05	3.84	2.23	02:50	0.41	20:05	1.73	1.11	02:50	0.008	20:05	0.215	0.072	0.072	-	-	-	-	-	-
11/11/2020	04:15	1.05	19:40	3.91	2.25	05:15	0.51	19:40	1.77	1.13	05:00	0.010	19:40	0.224	0.074	0.074	-	-	-	-	-	-
11/12/2020	04:35	1.45	19:25	3.73	2.27	04:15	0.57	19:25	1.75	1.17	04:15	0.020	19:25	0.208	0.075	0.075	-	-	-	-	-	-
11/13/2020	05:10	0.92	07:40	3.27	2.17	05:20	0.43	07:40	1.71	1.12	05:10	0.007	07:40	0.170	0.069	0.069	-	-	-	-	-	-
11/14/2020	01:40	1.03	09:10	3.73	2.34	02:00	0.47	10:20	1.73	1.14	02:00	0.009	10:20	0.201	0.079	0.079	-	-	-	-	-	-
11/15/2020	02:35	1.10	11:50	3.87	2.36	02:40	0.55	11:50	1.69	1.14	02:35	0.012	11:50	0.211	0.080	0.080	-	-	-	-	-	-
11/16/2020	02:40	1.00	19:35	3.61	2.23	02:40	0.40	19:35	1.70	1.10	02:40	0.007	19:35	0.193	0.071	0.071	-	-	-	-	-	-
11/17/2020	05:05	1.04	10:20	3.50	2.19	04:55	0.46	10:20	1.64	1.11	04:55	0.009	10:20	0.179	0.070	0.070	-	-	-	-	-	-
11/18/2020	04:05	1.06	10:00	3.66	2.24	04:05	0.51	10:00	1.71	1.14	04:05	0.010	10:00	0.198	0.072	0.072	-	-	-	-	-	-
11/19/2020	02:40	1.02	08:55	3.51	2.25	04:30	0.43	19:55	1.64	1.14	02:40	0.009	08:55	0.179	0.075	0.075	-	-	-	-	-	-
11/20/2020	02:35	1.03	15:10	3.31	2.24	04:45	0.43	11:25	1.53	1.14	02:35	0.009	12:35	0.151	0.073	0.073	-	-	-	-	-	-
11/21/2020	04:05	1.06	15:40	3.84	2.28	06:20	0.42	15:40	1.80	1.17	06:25	0.009	15:40	0.222	0.078	0.078	-	-	-	-	-	-
11/22/2020	00:30	1.04	10:20	3.77	2.26	05:10	0.35	11:20	1.69	1.14	05:10	0.008	10:20	0.202	0.076	0.076	-	-	-	-	-	-
11/23/2020	00:10	1.10	09:45	3.28	2.20	00:40	0.47	09:45	1.70	1.15	00:10	0.010	09:45	0.169	0.072	0.072	-	-	-	-	-	-
11/24/2020	05:05	1.08	19:25	3.84	2.33	05:50	0.49	19:25	1.68	1.15	05:50	0.010	19:25	0.208	0.078	0.078	-	-	-	-	-	-
11/25/2020	02:25	1.05	09:50	3.77	2.33	02:30	0.50	09:50	1.64	1.15	02:30	0.010	09:50	0.198	0.078	0.078	-	-	-	-	-	-
11/26/2020	05:30	1.08	09:55	4.12	2.25	05:45	0.42	09:55	1.83	1.15	05:15	0.009	09:55	0.248	0.076	0.076	-	-	-	-	-	-
11/27/2020	00:00	1.04	19:00	3.56	2.22	04:55	0.46	19:00	1.65	1.14	04:55	0.009	19:00	0.184	0.073	0.073	-	-	-	-	-	-
11/28/2020	05:50	0.98	14:35	3.69	2.22	04:45	0.44	14:35	1.73	1.14	05:55	0.008	14:35	0.202	0.075	0.075	-	-	-	-	-	-

10/23/2020 00:00 - 11/28/2020 23:59

	DFINAL (in)	VFINAL (ft/s)	QFINAL (MGD - Total MG)	Rain (in)
Total			2.752	
Average	2.25	1.14	0.074	

15201 Springdale Street
Huntington Beach, CA 92649

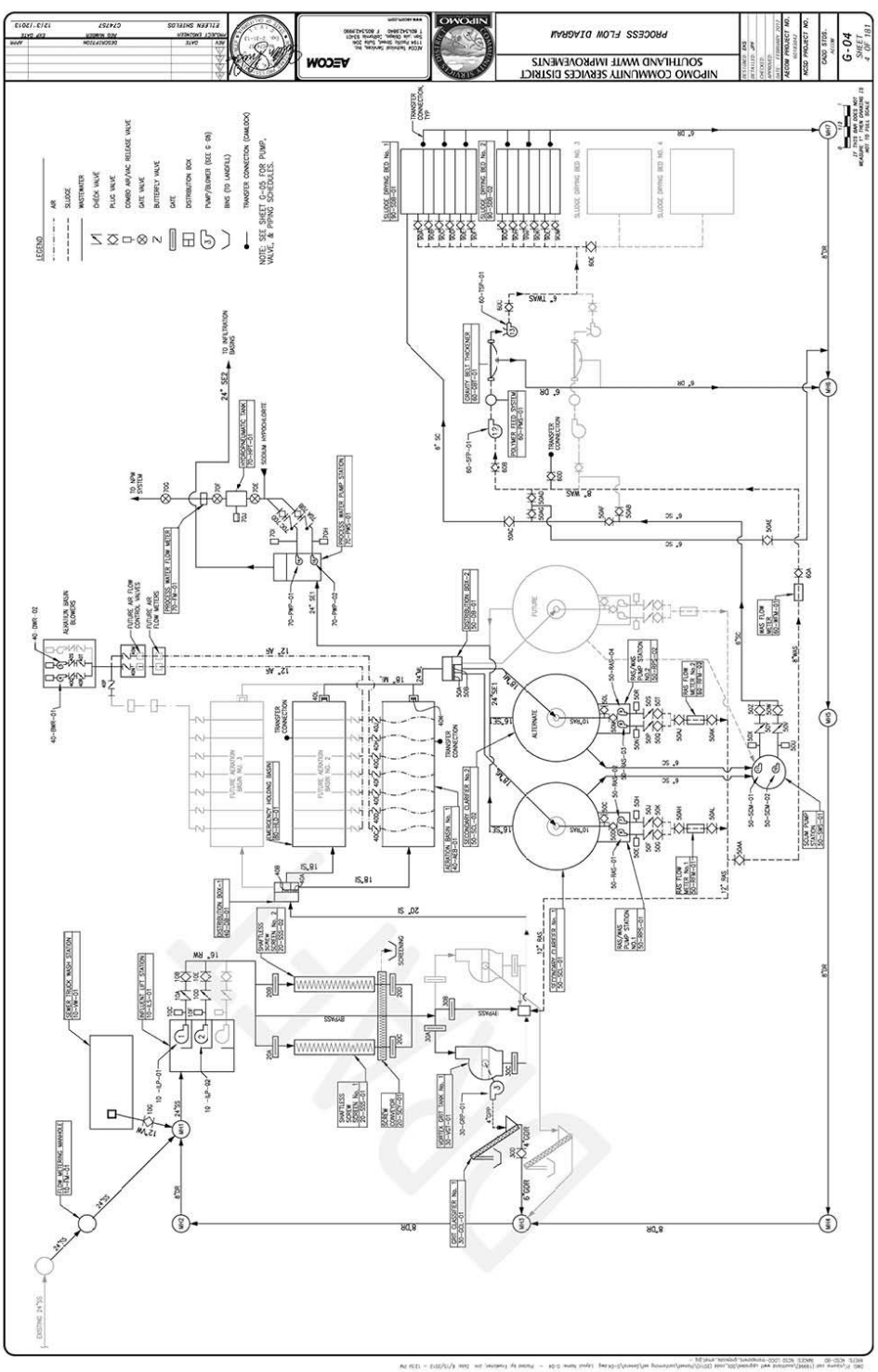
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NCSD-58 (cont'd)

APPENDIX B

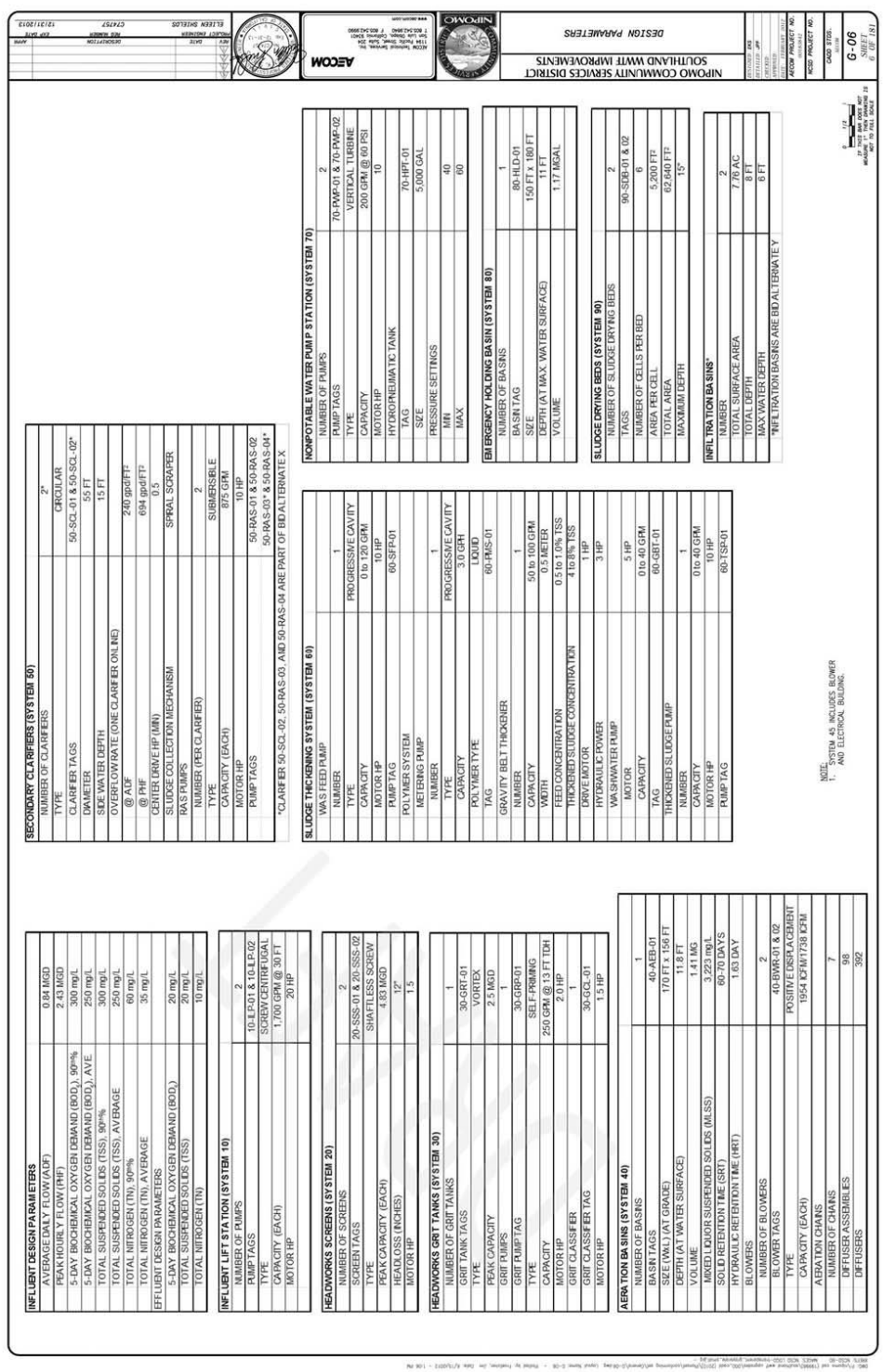
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APPENDIX C

NCSD-58
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Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Recommended: New 16-Inch Main on North Oak Glen Drive and Tefft Street
OPINION OF PROBABLE PROJECT COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	Amount
1	Mobilization/Demobilization	1	LS	$313,000	$313,000
2	Stormwater Pollution Prevention Plan	1	LS	$60,000	$60,000
3	Environmental mitigation measures and permits	1	LS	$40,000	$40,000
4	Traffic Control	14,900	LF	$10	$149,000
5	Furnish and install 16-inch diameter AWWA DIP pipe and appurtenances within paved streets	15,200	LF	$320	$4,864,000
6	Furnish and install 30-inch diameter steel casing pipe via trenchless installation with 16-inch diameter AWWA DIP pipe	300	LF	$1,800	$540,000
7	Pipe connections to existing system (valves and tee)	13	EA	$24,000	$312,000
8	Install service lateral and connect to existing water meters	38	EA	$4,000	$152,000
9	Install air release valve	9	EA	$5,000	$45,000
10	Install hydrant lateral and connect to existing hydrant	10	EA	$9,000	$90,000
				Subtotal	$6,565,000
	Administration, Engineering, and Construction Management			30%	$1,970,000
	Construction Contingency			30%	$1,970,000
	Estimated Total Project Cost (Rounded)				$10,510,000

Notes:
1. Pipeline installation costs include pavement removal/ restoration and pipeline disinfection.
2. Service replacement based on number of parcels along frontage of pipeline alignment. Final estimate to be determined during design
3. Number of hydrant laterals to be reconnected based on District GIS

MKN Associates, Inc. 1/10/2022 Page 1

NCSD-58
(cont'd)

Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Willow Road End of Line Connection
OPINION OF PROBABLE PROJECT COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	Amount
1	Mobilization/Demobilization	1	LS	$8,000	$8,000
2	Traffic Control	500	LF	$10	$5,000
3	Furnish and install 12-inch diameter AWWA C900 PVC pipe and appurtenances within paved streets	500	LF	$250	$125,000
4	Pipe connections to existing system (valves and tee)	2	EA	$12,000	$24,000
				Subtotal	$162,000
	Administration, Engineering, and Construction Management			30%	$49,000
	Construction Contingency			30%	$49,000
				Estimated Total Project Cost	$260,000
Notes:					
1. Pipeline installation costs include pavement removal/ restoration and pipeline disinfection.					

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Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
New 1.0 MG Reservoir at Foothill Tank Site
OPINION OF PROBABLE PROJECT COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	Amount
1	Mobilization (5%)	1	LS	$117,000	$117,000
2	Earthwork	1	LS	$100,000	$100,000
3	Demolition and Site Preparation	1	LS	$30,000	$30,000
4	New 1.0 MG Welded Steel Reservoir	1000000	Gal	$1.25	$1,250,000
5	Tank Foundation and Anchorage	1	LS	$250,000	$250,000
6	Disinfection Booster Facility	1	LS	$200,000	$200,000
7	Piping and Valves	1	LS	$300,000	$300,000
8	Electrical (Allowance)	1	LS	$100,000	$100,000
9	Instrumentation and Controls (Allowance)	1	LS	$100,000	$100,000
				Subtotal	$2,447,000
	Administration, Engineering, and Construction Management			30%	$735,000
	Construction Contingency			30%	$735,000
	Estimated Total Project Cost (Rounded)				$3,920,000

NCSD-58
(cont'd)

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Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
New 0.5 MG Reservoir at Joshua Road Pumping Station
OPINION OF PROBABLE PROJECT COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	Amount
1	2016 Cost Estimate	1	LS	$2,500,000	$2,500,000
2	ENR Adjustment				$471,693
				Subtotal	$2,971,693
	Administration, Engineering, and Construction Management			30%	$892,000
	Construction Contingency			30%	$892,000
				Estimated Total Project Cost (Rounded)	$4,760,000

Notes:
1. Construction cost opinion was escalated from Jan 2016 estimate to September 2021 using the ENR-CCI LA cost index (Jan 2016 = 11,115.28 to Sep 2021 = 13,212.48).

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NCSD-58
(cont'd)

Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Alternative: New 16-Inch Main from Foothill Tanks to Sandydale
OPINION OF PROBABLE PROJECT COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	Amount
1	Mobilization/Demobilization	1	LS	$254,000	$254,000
2	Stormwater Pollution Prevention Plan	1	LS	$60,000	$60,000
3	Environmental mitigation measures and permits	1	LS	$40,000	$40,000
4	Traffic Control	13,200	LF	$10	$132,000
5	Furnish and install 16-inch diameter AWWA DIP pipe and appurtenances within paved streets	13,500	LF	$320	$4,320,000
6	Furnish and install 30-inch diameter steel casing pipe via trenchless installation with 16-inch diameter AWWA DIP pipe	300	LF	$1,800	$540,000
7	Pipe connections to existing system (valves and tee)	2	EA	$24,000	$48,000
8	Install air release valve	5	EA	$5,000	$25,000
				Subtotal	$5,419,000
				Administration, Engineering, and Construction Management 30%	$1,626,000
				Construction Contingency 30%	$1,626,000
				Estimated Total Project Cost (Rounded)	$8,680,000

Notes:
1. Pipeline installation costs include pavement removal/ restoration and pipeline disinfection.

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NCSD-58
(cont'd)

Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Offsite Wastewater Collection System Improvements
OPINION OF PROBABLE CONSTRUCTION COST - PLANNING

Item	Description	Quantity	Unit	Unit Price	ENR Adjustment	Amount (Rounded)
1	Mobilization/Demobilization	1	LS	$93,920	1.09	$103,000
2	Stormwater Pollution Prevention Plan	1	LS	$60,000	1.09	$66,000
3	Environmental mitigation measures and permits	1	LS	$40,000	1.09	$44,000
	Upgrade Frontage Road 15-in Gravity Sewer Main					
4	15-in Gravity Sewer	3500	LF	$250	1.09	$955,000
5	Precast Manholes w/Coating	12	EA	$20,000	1.09	$262,000
6	Laterals	5	EA	$3,000	1.09	$17,000
7	Traffic Control/Regulation	3500	LF	$12	1.09	$46,000
8	Pavement Repair (Full Lane Width)	1	LS	$147,000	1.09	$161,000
9	Abandon Existing Sewerline & Manholes	3500	LF	$10	1.09	$39,000
	Upgrade Frontage Road 18-in Gravity Sewer Main					
10	18-in Gravity Sewer	1200	LF	$280	1.09	$367,000
11	Precast Manholes w/Coating	4	EA	$20,000	1.09	$88,000
12	Laterals	10	EA	$3,000	1.09	$33,000
13	Traffic Control/Regulation	1200	LF	$12	1.09	$16,000
14	Pavement Repair (Full Lane Width)	1	LS	$52,000	1.09	$57,000
15	Abandon Existing Sewerline & Appurtenances	1200	LF	$10	1.09	$14,000
				Subtotal		$2,268,000
	Administration, Engineering, and Construction Management			30%		$681,000
	Construction Contingency			30%		$681,000
	Estimated Total Project Cost (rounded)					$3,630,000

Notes:
1. Lateral replacement based on number of parcels along frontage of pipeline alignment. Final estimate to be determined during design.

2. Construction cost opinion was escalated from July 2019 Blacklake Consolidation Study Engineering Report (MKN) to September 2021 using the ENR-CCI LA cost index (June 2019 = 12113.16 to Sep 2021 = 13212.48).

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MKN Associates, Inc. 1/10/2022 Page 6

Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Wastewater Treatment Plant Improvements
Basis for Unit Process Costs (Planning-Level)

OPINION OF PROBABLE CAPITAL COST

Item	Description	Unit	Unit Price	Quantity	ENR Adjustment*	Amount
GRIT REMOVAL SYSTEM						
1	Grit Removal Equipment	EA	$162,000	1	1.28	$207,800
2	Civil	LS	$73,000	1	1.28	$93,600
3	Structural	LS	$97,000	1	1.28	$124,400
4	Electrical	LS	$9,000	1	1.28	$11,500
5	Instrumentation	LS	$4,000	1	1.28	$5,100
	Subtotal					$442,400
BIOLAC WAVE OXIDATION SYSTEM - BASIN						
1	BioLac Equipment	EA	$628,000	1	1.28	$805,600
2	Civil	LS	$86,000	1	1.28	$110,300
3	Structural	LS	$179,000	1	1.28	$229,600
4	Electrical	LS	$18,000	1	1.28	$23,100
5	Instrumentation	LS	$3,000	1	1.28	$3,800
	Subtotal					$1,172,400
BIOLAC WAVE OXIDATION SYSTEM - BASIN 3						
1	BioLac Equipment	EA	$628,000	1	1.28	$805,600
2	Civil	LS	$344,000	1	1.28	$441,300
3	Structural	LS	$179,000	1	1.28	$229,600
4	Electrical	LS	$18,000	1	1.28	$23,100
5	Instrumentation	LS	$3,000	1	1.28	$3,800
	Subtotal					$1,503,400
BLOWER BUILDING						
1	Civil	LS	$89,000	1	1.28	$114,200
2	Structural	LS	$267,000	1	1.28	$342,500
3	Electrical	LS	$286,000	1	1.28	$366,900
4	Instrumentation	LS	$140,000	1	1.28	$179,600
	Subtotal					$1,003,200
SECONDARY CLARIFIER						
1	Clarifier Equipment	EA	$203,000	1	1.28	$260,400
2	RAS/WAS Pump Equipment	EA	$33,000	2	1.28	$84,700
3	RAS/WAS Flow Meter	EA	$11,000	1	1.28	$14,100
4	Scum Pump Equipment	EA	$69,000	1	1.28	$88,500
5	Civil	LS	$440,000	1	1.28	$564,400
6	Structural	LS	$740,000	1	1.28	$949,200
7	Electrical	LS	$39,000	1	1.28	$50,000
8	Instrumentation	LS	$25,000	1	1.28	$32,100
	Subtotal					$2,043,400
SLUDGE THICKENING SYSTEM						
1	Sludge Thickening Equipment	EA	$255,000	1	1.28	$327,100
2	Flow Meter	LS	$9,000	1	1.28	$11,500
3	Civil	LS	$93,000	1	1.28	$119,300
4	Structural	LS	$77,000	1	1.28	$98,600
5	Electrical	LS	$28,000	1	1.28	$35,900
6	Instrumentation	LS	$16,000	1	1.28	$20,500
	Subtotal					$612,900

Cost opinions were estimated by averaging bids from the District's 2012 Southland Wastewater Treatment Improvements Project. Construction cost opinion was escalated from May 2012 to September 2021 using the ENR-CCI LA cost index. May 2012 (10300.05) and Sep 2021 (13212.48) values were used to escalate estimated cost to present value.

SLUDGE DEWATERING SCREW PRESS

1	Screw Press, Building, Structural, Mechanical, Electrical, and Instrumentation	EA	$1,037,022	1	1.10	$1,135,900

Cost opinions were estimated by averaging bids from the District's 2020 Southland Wastewater Treatment Facility Dewatering Screw Press Project. Constructior cost opinion was escalated from September 2020 to September 2021 using the ENR-CCI LA cost index. September 2020 (12062.34) and Sep 2021 (13212.48) values were used to escalate estimated cost to present value.

NCSD-58 (cont'd)

Nipomo Community Services District
Dana Reserve Water and Wastewater Evaluation
Wastewater Treatment Plant Improvements Under Future Permit Requirements
OPINION OF PROBABLE CONSTRUCTION COST - PLANNING

Planning Level Project Cost - Southland WWTF Improvements to Meet Existing Demands with Dana Reserve					
Item	**Description**	**Quantity**	**Unit**	**Unit Price**	**Amount (Rounded)**
1	Mobilization (5% of Items 2 through 9)	1	LS	$474,700	$475,000
2	General Site Grading and Paving (4% of Items 4 through 9)	1	LS	$293,172	$294,000
3	General Site Civil (10% of Items 4 through 9)	1	LS	$732,930	$733,000
4	Influent Lift Station Pump Improvements	1	LS	$50,000	$50,000
5	New Grit Chamber System	1	LS	$442,400	$443,000
6	New Aeration Basin #2 and #3	1	LS	$2,675,800	$2,676,000
7	New Blower Building and Blower System Improvements	1	LS	$1,504,800	$1,505,000
8	New Clarifier and RAS Pumping Improvements	1	LS	$2,043,400	$2,044,000
9	New Sludge Thickening System	1	LS	$612,900	$613,000
10	New Screw Press	1	LS	$1,135,900	$1,136,000
	Subtotal				$9,969,000
	Construction Contingency			30%	$2,991,000
	Engineering, Administrative, and Construction Management Allowance			30%	$2,991,000
				Total	***$15,960,000***

ENR (LA) September 2021 = 13212.48

NCSD-58
(cont'd)

9.2.10.1 Response to Letter from Nipomo Community Services District (via RWG Law)

Comment No.	Response
NCSD-1	The comment refers to ES-1 and states that the 22.3 acres shown for "Village and Flex Commercial" zones is not consistent with the 18.9 acres of commercial development evaluated in NCSD's Water and Wastewater Service Evaluation for the project dated March 30, 2022. The comment also clarifies that the NCSD's March 30, 2022 Water and Wastewater Service Evaluation superseded the February 7, 2022 version that was included in the Draft EIR as Appendix H. The most current March 30, 2022, Water and Wastewater Service Evaluation has been added to Appendix H.
NCSD-2	The comment recommends minor additions/revisions to the Project Objectives. These revisions have been incorporated for the stated project objectives in the *Executive Summary*; Chapter 2, *Project Description*; and Chapter 5, *Alternatives Analysis*, of the EIR.
NCSD-3	The comment requests Mitigation Measure AES/mm-3.1 be revised to refer to the to the numerical oak tree replacement ratios required in BIO/mm-18.2. Mitigation Measure AES/mm-3.1 has its own performance standard identified, which is that the planting must be sufficient to achieve a minimum of 50% visual screening. In addition, AES/mm-3.1 requires that all existing trees be preserved within the Visual Screening Zone, whereas BIO/mm-18.2 provides mitigation requirements for oaks to be removed or impacted. Therefore, BIO/mm-18.2 may not apply to oaks within the Visual Screening Zone. No changes to the EIR have been made in response to this comment.
NCSD-4	The comment notes that reclaimed water is not available from the NCSD and suggests minor edits to Mitigation Measure AQ/mm-3.2 to require the use of approved dust suppressants instead of water if feasible instead of requiring the contractor to "consider the use of an approved dust suppressant". The fact that reclaimed (recycled) water is not currently available from the NCSD is stated in 2.5.3.4.2 of the EIR. Mitigation Measure AQ/mm-3.2 has been revised to state "…the contractor or builder shall require the use of a San Luis Obispo Air Pollution Control District-approved dust suppressant where feasible to reduce the amount of water used for dust control." This revision has been incorporated in the *Executive Summary* and Section 4.3, Air Quality, in the EIR. In addition, Mitigation Measure AQ/mm-3.1 requires preparation of a Construction Activity Management Plan (CAMP), which is required to include a dust-control management plan and other requirements to maximize dust control.
NCSD-5	The comment suggests Mitigation Measure BIO/mm-1.1 be clarified to apply to both off-site improvements and the Specific Plan Area. Mitigation Measure BIO/mm-1.1 has been revised to clarify it would apply to both on-site and off-site improvement areas. This revision has been incorporated in the *Executive Summary* and Section 4.4, *Biological Resources*, in the EIR. Note that (1) the Specific Plan Area, (2) the off-site North Frontage Road Extension Parcel, and (3) the location of off-site transportation, water, and wastewater improvements were all evaluated under separate subheadings in the Biological Resources section of the EIR (Section 4.4). BIO/mm-1.1 is in a section evaluating potential impacts in the Specific Plan Area, but was also made a requirement for the off-site North Frontage Road Extension Parcel and the off-site transportation, water, and wastewater improvements through BIO Impact 10 (North Frontage Road Extension Parcel) and BIO Impact 11 (off-site transportation, water, and wastewater improvements). The *Executive Summary* also reflects BIO/mm-1.1 applying to the Specific Plan Area in Table ES-1, *Summary of Impacts and Mitigation Measures*. The reference to "BIO/mm 1" under the discussion of BIO Impact 11 has also been corrected to "BIO/mm-1.1".
NCSD-6	The comment asks whether the mitigation activities discussed under BIO Impacts 11-13 would require permits from CDFW and/or USFWS and, if so, suggests the measures should specify that requirement and that the applicant would be required to obtain them. BIO Impact 11 relates to monarch butterfly, sharp-shinned hawk, Cooper's hawk, white-tailed kite, and other nesting birds. Monarch butterfly is a federal candidate species; impacts to federal candidate species do not require a take permit from the USFWS. Monarch butterfly is not a state candidate species, it is only a CDFW Special Animal. Therefore, it would also not currently require a take permit from CDFW. However, if monarch butterfly are reclassified as a state candidate species in the future, a take permit would be required from CDFW in the event of potential take (CDFW requires take permits for candidate species, while USFWS does not). White-tailed kite is a fully protected species; you cannot take the species or get a permit allowing take of the species. White-tailed kite are unlikely to nest in the off-site improvement area; however, if they are found, the only remedy is to wait until they leave on their own accord. The other species discussed under this impact are watch species and only protected by the Migratory Bird Treaty Act (MBTA); therefore, no permit would be required from CDFW or USFWS.

Comment No.	Response
	BIO Impact 12 relates to California red-legged frog (CRLF), western pond turtle, and two-stiped gartersnake. CRLF is very unlikely to occur in this portion of Nipomo Creek or the other off-site improvement areas; therefore, the EIR did not identify the need for a take permit and it is not likely to be required. However, no protocol level surveys were conducted to conclusively rule out any potential for CRLF to occur in the project area; therefore, the EIR conservatively required pre-construction surveys and, in the event a CRLF is found, a requirement that all work cease and the USFWS be consulted. Mitigation Measure BIO/mm-12.1 has been revised to clarify that, in the unlikely event a permit is required from USFWS, the applicant would be required to obtain the permit. It should also be noted that the project will likely require a Lake and Streambed Alteration Agreement (LSAA) from CDFW for boring under Nipomo Creek; this requirement is noted in BIO/mm-17.2. The LSAA may include requirements to avoid impacts to CRLF. Western pond turtle and two-striped gartersnake are CDFW Species of Special Concern. The off-site areas provide only marginally suitable habitat for these species, but their potential to occur cannot be ruled out entirely. CDFW Species of Special Concern do not require a permit from CDFW; therefore, if found, these species can be relocated without a take permit. However, CDFW may require avoidance measures as a requirement of their LSAA. BIO Impact 13 relates to least Bell's vireo and southwestern willow flycatcher. Both species are state and federally protected but are highly unlikely to occur in the project area. If they are found nesting in the project area, CDFW and USFWS would need to be contacted. The requirement for a take permit would depend on the situation (how far away is the nest, what construction activities are occurring near it, etc.). Mitigation Measure BIO/mm-13.1 has also been clarified to reflect that the applicant, in coordination with the NCSD, would be responsible for facilitating any necessary coordination with CDFW or USFWS with regard to any state or federally listed species.
NCSD-7	The comment requests Mitigation Measures BIO/mm-12.1 and 13.1 be revised to provide that the studies, project biologist's work, relocation, nesting bird surveys, other mitigations and their costs, permit costs, and costs of avoidance are all the applicant's responsibility. The applicant and NCSD would need to negotiate the responsibility of compliance with mitigation measures at the time the offsite improvements are constructed. CEQA does not require mitigation measures to name the individual(s) responsible for that mitigation; however, minor clarifications have been made throughout the EIR to indicate that mitigation responsibilities for off-site water and wastewater improvements would be complied with by the applicant, in coordination with the NCSD. No other changes are required in response to this comment.
NCSD-8	The comment requests Mitigation Measures BIO/mm-16.1, 17.1, 17.2, 17.3, and 19.1 be revised to reflect that all compliance obligations would be made at the applicant's cost. Refer to Response to Comment NCSD-7.
NCSD-9	The comment requests that BIO/mm-17.1 and 17.2 be revised to clarify that all requirements listed for NCSD shall be the applicant's expense. Please refer to response to comment NCSD-7.
NCSD-10	The comment requests that Mitigation Measure CR/mm-1.1 and all Cultural Resource mitigation measures be revised to clarify that the applicant will responsible for all associated costs. Refer to Response to Comment NCSD-7.
NCSD-11	The comment requests that Mitigation Measures GEO/mm-8.1 through 8.3 be revised to reflect that the applicant will be responsible for all associated costs. Refer to Response to Comment NCSD-7.
NCSD-12	The comment refers to Mitigation Measure N/mm-1.1 and states that construction of off-site NCSD improvements may require night construction activities between the hours of 10 p.m. and 6 a.m. to avoid impacts to customers and systems associated with the connection of water and wastewater improvements to existing NCSD systems. The comment states that under County LUO Section 22.10.120(A)(7), the noise and construction hour limitations do not apply to NCSD's work on the maintenance or modification of its facilities. Noise Impact 2 in the EIR has been revised to clarify that construction of off-site NCSD improvements may require night construction activities between the hours of 10 p.m. and 6 a.m. to avoid impacts to customers and systems associated with the connection of water and wastewater improvements to existing NCSD systems. The discussion of County LUO Section 22.10.120(A)(7) in the EIR has been revised to clarify that the noise and construction hour limitations do not apply to NCSD's work on the maintenance or modification of its facilities. Mitigation Measure N/mm-1.1 has been revised to clarify nighttime work would be allowed pursuant to approval through County LUO Section 22.10.120(A)(7).
NCSD-13	The comment refers to the analysis under Noise Impact 2 and reiterates the applicability of the County's LUO to NCSD's maintenance activities. Please refer to response to comment NCSD-12.

Comment No.	Response
NCSD-14	The comment refers to Impact PS 1 and states Mitigation Measure PS/mm-1 should be labeled in the chart and suggests as drafted, the mitigation measure is inadequate to support the conclusion that the project's impact on the need for fire services will be mitigated. CEQA is focused on physical changes to the environment; therefore, this impact discussion focuses on the potential for adverse physical changes to the environment resulting from the construction of new or expanded facilities. PS/mm-1.1 has been labeled in the *Executive Summary*. Please see Master Response MR-2, Public Facilities Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.
NCSD-15	The comment refers to Mitigation Measure WF/mm-3.1 and states NCSD will require vehicular access for NCSD vehicles for all NCSD-maintained water and sewer improvements located in any easement or open space area. Mitigation Measure WF/mm-3.1 would not prohibit NCSD access to NCSD-maintained water and sewer improvements located in any easement or open space area. A reference to the Nipomo Community Services District has been added to WF/mm-3.1 to ensure the master HOA coordinates with the NCSD prior to adoption of the Covenants, Conditions, and Restrictions.
NCSD-16	The comment suggests Mitigation Measure USS/mm-3.1 should be revised to require the NCSD's "approval" rather than "affirmative concurrence" pursuant to the findings required under NCSD's annexation policy and standards for new water and wastewater services. Mitigation Measure USS/mm-3.1 has been revised to require the NCSD's "approval" rather than "affirmative concurrence". This revision has been incorporated in the *Executive Summary* and Section 4.19, Utilities and Service Systems, in the EIR.
NCSD-17	The comment requests that the "adequacy" of potable water supply be added to Section 6, *Areas of Controversy*, although NCSD's evaluation shows that there is sufficient water supply available to serve the project, as detailed in the correct version of Appendix H. Section 6, *Areas of Controversy*, in the *Executive Summary* has been revised to also include the adequacy of the potable water supply as an area of controversy.
NCSD-18	The comment suggests Alternative 5 may reduce impacts to public services, including water and wastewater, and refers to more detailed comments on the Alternatives Analysis later in the comment letter. As discussed in Chapter 5, *Alternatives Analysis*, impacts related to public services and utilities and service systems were determined to be similar to those identified for the proposed project. Although development and population growth would be marginally reduced by roughly 306 units and 700 people under Alternative 5 in comparison to the proposed project, including associated demands on water and wastewater services, this level of growth would still be substantial. Based on this population increase, this alternative would increase demand on public services and facilities in a manner that is generally consistent with the proposed project. Although, this alternative would result in less residential development, the scale and level of growth associated with this alternative would still be significant. As such, Alternative 5 would result in a slightly reduced, but similar increase in demand on water and wastewater services from the NCSD. No changes to the Draft EIR are required in response to this comment. This comment is noted and will be forwarded to County decision makers for review and consideration.
NCSD-19	The comment suggest minor edits to the description of off-site water and wastewater improvements in Section 2.2.1.2.2. These revisions have been incorporated in Chapter 2, Project Description, and Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-20	The comment suggest minor clarifications to the description of off-site wastewater system improvements. This revision has been incorporated into footnotes 3 and 6 in Chapter 2, *Project Description*, in the EIR.
NCSD-21	The comment refers to Section 2.5.2 and suggests revising the text to note that a responsible agency could also be required to make consistency determinations relating to this EIR, not just the County. This revision has been incorporated in Section 2.5.2 of Chapter 2, *Project Description*, in the EIR.
NCSD-22	The comment asks if ADU estimates are included in the number of units listed in Table 2-5 in Chapter 2, *Project Description*. As stated in footnote 3 for Table 2-5, Accessory Dwelling Units (ADUs) would be allowable and would not count towards lot coverage. Table 2-5 does not specify a specific number of units; ADUs are not included in the unit counts in Table 2-4.

Comment No.	Response
NCSD-23	The comment recommends minor additions to text in Section 2.5.3.4.3 and Figures 2-20, 2-21, and 2-22 to note that all water and sewer lines dedicated to, and accepted by, NCSD must be located within public streets or dedicated property. Section 2.5.3.4.3 has been revised to specify that all water and sewer lines dedicated to, and accepted by, NCSD must be located within public streets or dedicated property. No other changes to the EIR are necessary.
NCSD-24	The comment requests minor clarifications to Section 2.5.3.4.4, *Off-Site NCSD Improvements*, for item 2 under *Off-Site Wastewater System Improvements*. This revision has been incorporated in Chapter 2, *Project Description,* in the EIR.
NCSD-25	The comment identifies a clarification needed in Table 2-11. Table 2-11 has been revised to reflect a total of 198 units in NBD 9.
NCSD-26	The comment identifies minor clarifications needed in Table 2-11 to correctly reflect the total number of multi-family units in NBDs 1, 2, and 10 to be constructed.
NCSD-27	The comment identifies appropriate updates and corrections/additions to the status of the annexation process. Section 2.5.6 in Chapter 2, Project Description, in the EIR has been revised to incorporate this additional information.
NCSD-28	The comment requests a description of NCSD's District Code and Annexation Policy be added to the Environmental Setting section of the EIR. Section 3.2.1.10 has been revised to reference the NCSD District Code and its Annexation Policy in Chapter 3, Environmental Setting, in the EIR.
NCSD-29	The comment requests that all mitigation measures that may be applicable to off-site improvements or work done by or with NCSD in connection with the project should be revised as necessary to clarify that all work required by that measure will be at the applicant's expense. Please refer to response to comments NCSD-7 through NCSD-10.
NCSD-30	The comment reiterates comments pertaining to potential biological impacts of off-site improvements in the area of Nipomo Creek, including in Section 4.4.1.3.3, specifically the location of NCSD improvements in relation to Nipomo Creek. Please refer to response to comment NCSD-8, which requires a wetland delineation be prepared for work in proximity to potentially jurisdictional areas to facilitate avoidance of potential impacts.
NCSD-31	The comment suggests the wetland delineation for off-site improvements should be completed prior to certification of the EIR and that, at a minimum, the EIR should specify that the wetland delineation for the off-site improvements must be completed at the applicant's expense and prior to the NCSD's consideration of any annexation application. As discussed in Chapter 2, *Project Description*, off-site improvements have not been designed and their precise location is not currently known. However, all water system improvements are expected to occur within existing paved roadways, existing public ROW areas, and/or existing NCSD facilities. Each of these improvements is evaluated at a programmatic level in the EIR. Subsequent environmental review of these improvements, if necessary, would be required as described in Section 2.5.2, *Environmental Review of Subsequent Development Proposals*. While a wetland delineation could be completed at this time, it is not necessary for the programmatic evaluation of the off-site improvements. Site conditions that inform the delineation (regulatory requirements, high water marks, vegetation types/locations, etc.) change over time; therefore, a delineation completed now may not be valid at the time future off-site improvements are constructed. It is assumed, based on the current understanding of needed off-site improvements, that jurisdictional areas could easily be avoided during future construction of off-site improvements. The wetland delineation is needed at the time of construction to identify more specifically the exact location of jurisdictional areas, so the NCSD can confirm construction techniques and location are designed to avoid any potential impacts. In the event jurisdictional areas can't be avoided for some reason, additional CEQA evaluation would be required per Section 2.5.2 of the EIR (Environmental Review of Subsequent Development Proposals). No additional changes are required to address this comment.
NCSD-32	The comment requests clarification regarding whether BIO/mm-1.1 includes off-site areas as well as the Specific Plan area. Please refer to Response to Comment NCSD-5, above.
NCSD-33	The comment refers to PS Impact 1 and states the EIR does not identify how the applicant's payment of the County's Public Facilities Fees over a significant period of time will guarantee that there is a fire station, firefighters, and equipment on-site when the impacts of this development begin to be experienced by the

Comment No.	Response
	residents of Nipomo. Please refer to Master Response MR-2 and the response to comment NCSD-14, above. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which reflects a project change that would include an offer to donate an improved 2-acre site for a future fire station within the Specific Plan Area.
NCSD-34	Please refer to response to comment NCSD-14.
NCSD-35	The comment suggests minor edits to the description of existing groundwater conditions. These revisions have been incorporated in Section 4.19, Utilities and Service Systems, in the EIR.
NCSD-36	The comment recommends clarifications in Section 4.19.1.1.1, *Water Supply*, under *Purchased or Imported Water*. This revision has been incorporated in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-37	The comment suggests minor edits in Section 4.19.1.1.1, *Water Supply*, to update the number of annexations under review in in Tables 4.19-10, 4.19-10, and 4.19-12. This revision has been incorporated in Tables 4.9-10 and 4.9-11. The number of annexations under review identified in Table 4.19-12 is 176; therefore, no revisions to that table were necessary in response to this comment.
NCSD-38	The comment corrects data in Section 4.19.1.1.1, *Water Supply*, in Table 4.19-12. These revisions have been incorporated in Table 4.19-12 in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-39	The comment refers to Table 4.19-4 and states the peak hour flow line should be 1.5 mgd based on Table 3-13 of the MKN report. It appears this comment intended to refer to Table 4.19-14, not Table 4.19-4. The peak hour flow rate of 1.3 mgd is from Table 3-2, *Historical Southland WWTP Influent Flow and Loading (January 2019 – December 2020)*, in the NCSD Dana Reserve Development Water and Wastewater Evaluation prepared by MKN (2022). Therefore, this value is accurately represented in Table 4.19-14 and does not need to be revised.
NCSD-40	The comment refers to Table 4.19-16 in 4.19.1.1.1, *Wastewater*, under *NCSD Service Area Wastewater Projections*, and states the 10-year water production column should be revised to read 96,198 for residential suburban under the DR Evaluation. Table 4.19-16 has been revised accordingly in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-41	The comment states that the incorrect version of the water evaluation was included as Appendix H to the Draft EIR. The February 7, 2022, version of the report in Appendix H has been replaced with the updated Water and Wastewater Service Evaluation for the project dated March 30, 2022.
NCSD-42	The comment corrects background information about the IWMA in Section 4.19.1.1.4, *Solid Waste Disposal*, under *San Luis Obispo County Integrated Waste Management Authority*. These revisions have been incorporated into Section 4.19.1.1.4 in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-43	The comment requests Table 4.19-17 be updated to reflect the District Code and Annexation Policy. Table 4.19-17 has been revised accordingly.
NCSD-44	The comment is in reference to NCSD's potential need for night construction activities in USS Impact 1, under *Construction*, which are exempt County noise and construction limitations per County LUO Section 22.10.120(A)(7). Edits have been made in the *Construction* discussion under USS Impact 1. Please also refer to response to comment NCSD-12. These edits have also been incorporated in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-45	The comment reiterates the comments regarding the applicant's responsibility for the costs of mitigation. Please refer to response to comments NCSD-7, NCSD-8, and NCSD-31.
NCSD-46	The comment reiterates comment NCSD-41 regarding construction hours. Please refer to response to comment NCSD-12. These edits have also been incorporated in Section 4.19, *Utilities and Service Systems*, in the EIR.
NCSD-47	The comment reiterates a previous comment regarding Table ES-1. Table 4.19-19 is based on Table 2-5 of the NCSD's March 2022 Dana Reserve Development Water and Wastewater Service Evaluation (Appendix H). No changes to the EIR are required.

Comment No.	Response
NCSD-48	The comment states the discussion of peak flow conditions should refer to peak hour flow, not daily peak flows. This revision has been incorporated in the USS Impact 5 impact discussion in Section 4.19, Utilities and Service Systems, in the EIR.
NCSD-49	The comment clarifies peak flow in Table 4.19-21. The project total average daily flow is correctly identified as 228.86 in Table 4.19-21; therefore, no change is needed. Project peak flow has been clarified as “project peak hour flow”.
NCSD-50	The comment clarifies requirements for compost/green waste management per SB 1383. USS Impact 7 has been revised to include this information in Section 4.19, Utilities and Service Systems, in the EIR.
NCSD-51	The comment refers to Section 5.4.3 and states that Alternative 2 is alternately referred to as La Cañada Ranch or Cañada Ranch. Section 5.4.3 has been revised to only refer to La Cañada Ranch.
NCSD-52	The comment refers to the analysis of Alternative 3 in Section 5.4.4.3, particularly related to Utilities and Service Systems. Alternative 3 would allow for the construction of between 78-390 residential units, depending on whether or not the alternative could be serviced by the NCSD and the subdivision standards of the County LUO. The cost of expanding NCSD water and wastewater facilities to serve this reduced number of units would likely be prohibitively expensive. Therefore, this alternative generally evaluated both potential scenarios (service from NCSD and no service from NCSD). Assuming no NCSD utilities are provided, Alternative 3 would have to rely on on-site groundwater wells and septic systems. If annexation into the NCSD service area is unfeasible for Alternative 3, the alternative’s use of on-site wells and septic systems would increase potential impacts to the groundwater basin and potentially increase risk of water quality degradation. Therefore, potential impacts to Utilities and Service Systems would be increased, particularly in regard to threshold question (b), which asks whether the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This is the basis for the increased impact to Utilities and Service Systems under Alternative 3. The impact assessment is conservative considering the Title 19 water conservation 1:1 offset fee charged at the time of building permit issuance for new structures. This section also correctly describes that if annexation were to be feasible, the off-site infrastructure improvements would be similar to those of the proposed project; similar connections and extensions of water and wastewater facilities would be needed to bring water to and receive wastewater from the site; therefore, similar physical effects to the environment would occur as a result of construction of those facilities. The statement that Alternative 3 may require “new and expanded utility infrastructure, and may include water storage tanks and septic systems” is in the third paragraph of Section 5.4.4.3.19, under the discussion of the Specific Plan Area, so it relates to the Specific Plan Area not off-site improvements. This paragraph ultimately concludes the potentially significant impacts related to the construction of these facilities could be reduced with implementation of mitigation and compliance with state and local requirements, similar to the proposed project; therefore, for this Alternative 3 project component, impacts would not be increased compared to the proposed project as indicated in the comment. There is no basis to believe these types of on-site facilities would result in increased physical adverse effects under the reduced project analyzed under Alternative 3. The increased impact under this alternative is limited to the potential need to serve the development through groundwater pumping from on-site wells, although the increased pumping would be offset 1:1 through the County’s Title 19 water conservation offset fee. It is noted that NCSD disfavors any development that would not take domestic water service from the NCSD. Lastly, the comment questions whether the County could legally approve such an alternative, that would rely on on-site groundwater wells as the domestic water supply source. There is no policy regulation prohibiting the County from approving land divisions outside the NCSD service area. All new structures using water from the Nipomo Mesa Water Conservation Area, which includes the project site, are required to offset increased water use at a 1:1 ratio through water conservation projects for existing development (County Code Section 19.07.042). No changes to the EIR are required in response to this comment.

Comment No.	Response
NCSD-53	The comment states that without further clarification of the impacts of Alternative 3, the conclusion that Alternative 3 is the Environmentally Superior Alternative is not supported by the text of the Draft EIR. Refer to Response to Comment NCSD-52, above. Although Alternative 3 would potentially increase impacts to water supply, this alternative would significantly reduce or avoid impacts to Biological Resources, Greenhouse Gas Emissions, Land Use and Planning, Population and Housing, and Public Services (refer to Table 5-3, *Comparison of Impacts Among Alternatives*, of the EIR). Alternative 2, La Cañada Ranch, and Alternative 3, Residential Rural Cluster Subdivision, were both determined to substantially reduce or avoid several significant and unavoidable impacts associated with the proposed project; however, Alternative 3 would meet more of the project's basic objectives than Alternative 2. Therefore, it is properly identified as the Environmentally Superior Alternative.
NCSD-54	The comment requests that NCSD's requested changes to mitigation measures be carried over into the MMRP. NCSD's requested revisions to mitigation measures have been incorporated into the MMRP.
NCSD-55	The comment requests that the lift station be labeled on page 3 of Appendix C. Page 3 in Appendix C has been revised to include a label for the proposed lift station. On-site lift station locations are also shown on Figure 2-22 in Chapter 2 of the EIR.
NCSD-56	The comment requests that page 4 of Appendix C be revised to indicate that approximately at the intersection of Camino Caballo and Frontage Road a transition from force main to gravity main may be required. Page 4 in Appendix C has been revised to indicate that a transition from force main to gravity main may be required.
NCSD-57	The comment notes that the sewer lines shown on pages 8, 9, and 10 of Appendix C are existing. The legends have been clarified to indicate that the "Greater than 18" Frontage Rd Trunk Sewer" lines shown on these pages in bright yellow are existing.
NCSD-58	The NCSD provided an updated version of the NCSD Dana Reserve Development Water and Wastewater Service Evaluation, dated March 30, 2022. Appendix H has been revised to include the updated Water and Wastewater Service Evaluation for the project dated March 30, 2022.

9.2.11 San Luis Obispo Council of Governments

SLOCOG
SAN LUIS OBISPO COUNCIL OF GOVERNMENTS

CONNECTING COMMUNITIES
ARROYO GRANDE | ATASCADERO | GROVER BEACH
MORRO BAY | PASO ROBLES | PISMO BEACH
SAN LUIS OBISPO | SAN LUIS OBISPO COUNTY

August 1, 2022

Jennifer Guetschow
County of San Luis Obispo, Planning & Building Department
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Subject: Draft Environmental Impact Report for the Dana Reserve Specific Plan (PLN-1119, SUB2020-00047, LRP2020-00007, ED21-094)

Jennifer Guetschow:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (*PLN-1119, SUB2020-00047, LRP2020-00007, ED21-094*). The State of California and Federal Highway Administration designate SLOCOG as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), respectively, for the region. While SLOCOG does not have permit or regulatory authority for land use proposals, SLOCOG is responsible for planning the long-term viability of the regional surface transportation system, and for programming funds to achieve the objectives of the adopted Regional Transportation Plan and Sustainable Communities Strategy (2019 RTP). SLOCOG staff reviews land use projects, EIRs, and plans to ensure positive outcomes in transportation and land choices within and between our communities. After reviewing the DEIR, SLOCOG submits the following comments.

HOUSING

As stated in the 2019 RTP, SLOCOG supports the expansion of the region's supply of housing for renters, first-time homebuyers, and the broader workforce to maintain the vitality of the regional economy. In 2019, the eight jurisdictions and SLOCOG began to work collaboratively on solving our regional housing and infrastructure issues. This effort has led to a unanimously adopted regional compact, the inclusion of regional policies in all eight Housing Element updates, and the start of the Regional Housing and Infrastructure Plan. Two regional goals included in the County's Housing Element are to:

- Support policies, actions, and incentives that increase housing development of all types, available to people at all income levels.
- Encourage new development that helps to improve the balance of jobs and housing throughout the Region, providing more opportunities to residents to live and work in the same community.

SLOCOG-1

An action strategy of the 2019 RTP is to encourage local jurisdictions to approve a wide range of housing types in housing-deficient communities and support expanded employment opportunities in housing-rich communities to improve the existing jobs-housing imbalance. As stated on page 2-13, a primary objective of the Specific Plan is to "provide a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the General Plan, the County's Inclusionary Housing Ordinance, and regional housing needs." **SLOCOG is encouraged to see residential development that will help the County meet housing allocations established in the 2019 Regional Housing Needs Allocation (RHNA) Plan at various income levels. Additionally, SLOCOG is supportive of the mentioned local preference program for housing to be included in the Development Agreement.**

JOBS-HOUSING BALANCE

As stated on page 4.17-41 of the DEIR, "the first phase of development would include multi-family residential development (Neighborhoods 1, 2, 3, and 5), affordable housing (Neighborhood 10), commercial development (village commercial and flexible commercial), and a hotel and educational facility. Future development phases would

SLOCOG-2

include additional single-family residential development, a childcare center, a park, and extensions of the pedestrian and bicycle facilities to the larger network in Nipomo." The 2019 RTP supports residential development near existing employment centers. SLOCOG's 2019 RTP and 2019 RHNA both promote and identify improved jobs/housing balances within each of the subregions by distributing more homes, of all income levels, into the "jobs-rich" subregion. The 2019 RTP includes a future development pattern that promotes more jobs, along with necessary investments, into the "housing-rich" subregions (this includes the South County). This results in all subregions moving in the direction of a better jobs/housing ratio (2019 RHNA Plan, p.13), and lessens impacts of congestion on U.S. 101. The 2019 RTP identifies that the South County subregion has a Jobs to Housing ratio of 0.66 in 2015 and is projected to have a Jobs to Housing ratio of 0.69 in the 2035 Preferred Growth Scenario; indicating the need for more job opportunities. Since rural areas and smaller communities are not expected to offer 1:1 job for each home, the subregion (and the region) benefits when the incorporated cities' ratio is notably greater than 1:1. If imbalance in the South County subregion continues at 0.66 or worsens, one result will be increased congestion on our highways, primarily to enter the nearest major employment centers in San Luis Obispo and Santa Maria. **As stated in the DEIR, the residual impacts to the jobs-to-housing ratio would be significant and unavoidable (Class I) which is not consistent with the Jobs/Housing Balance Strategy of the 2019 RTP and the RHNA Plan.**

SLOCOG-2 (cont'd)

TRANSPORTATION

Increasing the connectivity of the regional transportation system is a goal of the 2019 RTP. SLOCOG is encouraged by Dana Reserve's Project Objectives to enhance circulation within the DRSP and existing community by continuing the existing public roadway network through the DRSP property to connect to Willow Road, providing a new Park and Ride lot to encourage carpooling, and creating new public transportation points of connection to facilitate public transit use and reduce single-occupant automobile use and to integrate a network of walking, bicycling, and equestrian facilities to connect on-site residential neighborhoods and the broader community (ES-4).

SLOCOG-3

Transportation Demand Management (TDM)

Providing various opportunities to use alternative transportation is important for reaching state and regional goals. SLOCOG has a long history of supporting Transportation Demand Management (TDM) activities through goals and strategies outlined in the 2019 RTP. Additionally, SLOCOG's Regional Rideshare division aims to increase sustainable travel choices through public outreach, education, and encouragement programs. The DEIR's TR Impact 3 is a Class I impact that includes mitigation though the implementation of a transportation demand management program or identification of transportation demand management strategies. **SLOCOG suggests working with SLO Regional Rideshare to incorporate TDM strategies to improve transportation access for residents and visitors since the project would result in Class I impacts to transportation and traffic.**

SLOCOG-4

Vehicle Miles Traveled (VMT)

According to the DEIR's Transportation Impact Study, "the project will have a significant and unavoidable impact to VMT." State and Local goals include both Vehicle Miles Traveled (VMT) and greenhouse gas emission reductions. A best practice is locating jobs and frequently used services close to where people live. By prioritizing commercial uses needed within Dana Reserve, vehicle trips can be reduced and or replaced with bike and walk trips. **Since buildout of the Specific Plan Area would exceed the County VMT thresholds, SLOCOG suggests the developer create a transportation demand management program to implement as part of the first development phase.**

SLOCOG-5

Transit

As stated in the DEIR, improved public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.) shall be implemented as part of AQ/mm-3.3 "if the project is located on an established transit route." Dana Reserve is not currently served by transit. Mitigation measure TR/mm-3.1 for TR Impact 3 includes improving or increasing access to transit as a protentional measure to reduce Vehicles Miles Traveled (VMT). Since these impacts are significant and unavoidable, **SLOCOG**

SLOCOG-6

suggests the developer work with the Regional Transit Authority (RTA) to include the new development as part of a served transit route. **SLOCOG-6 (cont'd)**

As stated in the DEIR, "the most effective TDM measures would be those related to reducing the cost of transit through commuter benefit programs (employers) and free or reduced-cost transit passes for new residents as part of the HOAs or other conglomeration." **SLOCOG is encouraged by this transit program.** **SLOCOG-7**

Park and Ride Lot
SLOCOG looks forward to working with the developer "to create, improve, or expand an on-site or nearby Park and Ride lot with car parking and bike lockers in proportion to the size of the project" (4.3-35). **SLOCOG-8**

Thank you again for the opportunity to provide input. We wish you and all parties involved continued success in moving the Dana Reserve Development forward. SLOCOG looks forward to continued coordination with the County and Developer to address the aforementioned transportation and land use comments. If there are any questions, please do not hesitate to contact me at (805) 781-8052 or ssanders@slocog.org.

Sincerely,

Sara Sanders

Sara Sanders, Transportation Planner
San Luis Obispo Council of Governments

Page 3 of 3

9.2.11.1 Response to Letter from San Luis Obispo Council of Governments

Comment No.	Response
SLOCOG-1	The comment expresses support for the residential development that will help the County meet housing allocations established in the 2019 Regional Housing Needs Allocation (RHNA) Plan and the local preference program for housing to be included in the Development Agreement. No changes to the environmental document are necessary in response to this comment.
SLOCOG-2	The comment refers to the jobs/housing balance and agrees with the Draft EIR conclusions that the residual impacts to the jobs-to-housing ratio would be significant and unavoidable (Class I), which is not consistent with the Jobs/Housing Balance Strategy of the 2019 RTP and the RHNA Plan. These policy inconsistencies are further discussed in Table 4.3-7. No changes to the environmental document are necessary in response to this comment.
SLOCOG-3	The comment states support for the project objectives to enhance circulation with the DRSP and existing community. No changes to the environmental document are necessary in response to this comment.
SLOCOG-4	The comment recommends working with SLO Regional Rideshare to incorporate TDM strategies to improve transportation access for residents and visitors. Mitigation Measure TR/mm-3.1 has been revised to specifically reference coordination with SLO Regional Rideshare in the development of TDM programs. No further changes to the environmental document are necessary in response to this comment.
SLOCOG-5	The comment suggests development of a transportation demand management program to implement as part of the first development phase to reduce VMT. As discussed in Section 4.17, *Transportation*, in the EIR, Mitigation Measure TR/mm-3.1 would require preparation and implementation of a transportation demand management program. No changes to the environmental document are necessary in response to this comment; however, Mitigation Measure TR/mm-3.1 has been clarified to reflect applicability to any future developer within the Specific Plan Area (as opposed to “each applicant”).
SLOCOG-6	The comment suggests the developer work with the Regional Transit Authority (RTA) to include the new development as part of a served transit route. As discussed in Chapter 2, *Project Description*, public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors. Collector A has been designed to accommodate a future transit stop within the Village Commercial area just west of the roundabout and at the Park and Ride location along Collector A just south of Willow Road. San Luis Obispo County RTA is expected to provide service to and stops within these designated transit hub locations. A requirement that the project applicant and/or subsequent developers coordinate with the RTA to include the Specific Plan area as part of a serviced transit route has been added to Mitigation Measure TR/mm-3.1.
SLOCOG-7	The comment expresses support for TDM measures related to reducing the cost of transit through commuter benefit programs (employers) and free or reduced-cost transit passes for new residents. Mitigation Measure TR/mm-3.1 has been revised to specify a preference for these types of TDM measures. No other changes to the environmental document are necessary in response to this comment.
SLOCOG-8	The comment expresses support for the creation, improvement, or expansion of an on-site or nearby Park and Ride lot, consistent with the requirements of Mitigation Measure AQ/mm-3.3 (7). No changes to the environmental document are necessary in response to this comment.

9.2.12 San Luis Obispo Local Agency Formation Commission

San Luis Obispo Local Agency Formation Commission

COMMISSIONERS

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ALTERNATES

DAWN ORTIZ-LEGG
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Special District Member

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City Member

David Watson
Public Member

STAFF

ROB FITZROY
Executive Officer

BRIAN A. PIERIK
Legal Counsel

IMELDA MARQUEZ
Analyst

Morgan Bing
Clerk Analyst

TO: **JENNIFER GUETSCHOW, COUNTY OF SAN LUIS OBISPO**

FROM: **ROB FITZROY, EXECUTIVE OFFICER** RF

DATE: **AUGUST 1, 2022**

SUBJECT: **DRAFT EIR - DANA RESERVE SPECIFIC PLAN**

Thank you for the opportunity to provide comment on the Draft EIR for the Dana Reserve Specific Plan. Our July 21, 2021 Notice of Preparation letter identified various considerations for incorporation into the EIR. In addition, at the July 21, 2022 Study Session held by LAFCO, several legally required factors were presented and discussed, these can be found in the LAFCO Policy and Procedures document available on our website. These findings were also transmitted via email on January 11, 2022. LAFCO must make findings per government code section 56668 during its decision-making process, and as a Responsible Agency will rely, in part, on the information in the EIR to do so.

At the July 21, 2022 Study Session, the Commission expressed concern about the sustainability and ongoing availability of water for the project. It is understood Nipomo Community Services District (NCSD) would provide water to the site via its legal entitlements, infrastructure, and obligations to purchase water from the City of Santa Maria, as documented in the Draft EIR. However, what is not clear is the status of the water reliability of the source of the water from the City of Santa Maria and the Santa Maria Groundwater Basin itself. Presumably water would be sourced from the Santa Maria Groundwater Basin, but it is also possible the supply may come from other sources such as surface water from Twitchell Reservoir. The EIR should expand on this and discuss the reliability of the sources(s), and per factor in government code section 56668 (L) describe adequacy and availability of water supply for the project. **LAFCO-1**

We look forward to ongoing coordination. Thank you.

9.2.12.1 Response to Letter from San Luis Obispo Local Agency Formation Commission

Comment No.	Response
LAFCO-1	The comment relates to the sustainability and ongoing availability of water for the project from the City of Santa Maria. Please see Master Response MR-1, Groundwater Water Management and Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.

9.2.13 California Department of Fish and Wildlife

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Ave
Fresno, California 93710
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 3, 2022

Jennifer Guetschow
Supervising Planner
County of San Luis Obispo Planning and Building Department
976 Osos Street, Room 200
San Luis Obispo, California 93408
jGuetschow@co.slo.ca.us

Subject: Dana Reserve Specific Plan (Project)
Draft Environmental Impact Report (DEIR)
SCH No.: 2021060558

Dear Ms. Guetschow:

The California Department of Fish and Wildlife (CDFW) received a draft Environmental Impact Report (DEIR) from the County of San Luis Obispo Planning and Building Department for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. While the comment period may have ended, CDFW would appreciate if you will still consider our comments.

CDFW-1

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

CDFW-1 (cont'd)

PROJECT DESCRIPTION SUMMARY

Proponent: Dana Reserve, LLC

Objective: The Project applicant, Dana Reserve, LLC, submitted a draft Specific Plan and Vesting Tentative Tract Map (VTTM) in June 2020 for the 288-acre Dana Ranch property (previously referred to as Cañada Ranch). The Dana Reserve Specific Plan (DRSP) is a primarily residential project with over 75% of the Specific Plan Area designated for residential uses, which would accommodate up to 1,289 single-family and multi-family residential units. However, it identifies a mix of land uses within the Specific Plan Area to serve the new neighborhoods and surrounding community. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and light industrial uses), open space, trails, and a public neighborhood park within the Specific Plan Area.

Location: The Project area is located within the unincorporated area of San Luis Obispo County. The Specific Plan Area is located adjacent to the northern boundary of the Nipomo Urban Reserve Line (URL)/community of Nipomo, and directly west of U.S. Route 101 (US-101). The cross streets are Willow Road and Highway 101.

CDFW-2

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- Longitude: 35° 2' 43.59"; Latitude: -120° 30' 1.73"
- Assessor's Parcel Numbers: 091-301-073; 091-301-031, and 091-301-030 – totaling approximately 288-acres. The main parcel is 091-301-073 (274.4 acres in size). The other parcels connect the main parcel to Willow Road. The project also includes the off-site dedication of an open space and conservation easement on a property known as Dana Ridge (APNs 090-031-003 and 090-031-004), located approximately 2.1 miles east/southeast of the project site.

CDFW-2 (cont'd)

Timeframe: Unspecified

COMMENTS AND RECOMMENDATIONS

CDFW previously commented on the Notice of Preparation (NOP) for the Project in a letter dated July 23, 2021. Our July 23, 2021 letter (attached) provided recommendations for listed plant and wildlife species, and concerns for Project impacts. CDFW recognizes that some of the recommendations from the letter were included in the DEIR for the Project. CDFW maintains the same recommendations for advised survey methods and mitigation measures be included in the DEIR. CDFW has the following comments and recommendations on specific mitigation measures to be included in the DEIR in regard to compliance with the California Endangered Species Act (CESA) and Fish and Game Code section 1600 *et seq*.

White-Tailed Kite (*Elanus leucurus*) (WTK)

The State fully protected WTK has the potential to nest and/or forage within the Project site and its vicinity (Biogeographic Information and Observation System (BIOS). Accessed July 7, 2022). Without appropriate mitigation measures, Project activities conducted within occupied territories have the potential to significantly impact this species. Potentially significant impacts that may result from Project activities include nest abandonment, loss of nest trees, and/or loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), and direct mortality. The Project will involve noise, groundwork, and movement of workers that may occur directly adjacent to large trees and other features with potential to serve as nest sites. These activities have the potential to significantly impact fully protected raptor populations.

CDFW-3

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of Project implementation to determine if the Project site or its vicinity (within ½ mile) contains suitable habitat for fully protected raptors. CDFW also recommends that focused surveys be conducted by experienced biologists at the Project site prior to Project implementation. To avoid impacts to these species, CDFW recommends conducting these surveys in accordance with protocols developed by CDFW. If Project activities are to take place during the typical bird breeding season (February 1 through September 15), CDFW recommends that additional pre-activity surveys for active nests

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be conducted by a qualified biologist no more than 10 days prior to the start of Project activity.

In the event a WTK is found within ½ mile of the Project site, implementation of avoidance measures is warranted. CDFW recommends that a qualified wildlife biologist be on-site during all Project-related activities and that a ½-mile no-disturbance buffer be implemented. If the ½-mile no-disturbance buffer cannot feasibly be implemented, contacting CDFW for assistance with additional avoidance measures is recommended. Fully addressing potential impacts to the WTK and requiring measurable and enforceable mitigation in the DEIR is recommended.

CDFW-3 (cont'd)

Burrowing Owl (*Athene cunicularia*) (BUOW)

Due to the presence of suitable habitat (grassland and small mammal burrows) BUOW, a State species of special concern (SSC) that relies on burrows year-round, could be present in the Project area. No mitigation measures were included in the DEIR for this species due to no sightings of BUOW during surveys. However, BUOW could potentially be using the site between the time surveys were conducted and the time of the Project will be constructed. Potentially significant direct impacts from construction activities may result in burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable.

CDFW-4

CDFW recommends no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

No-disturbance buffers differ regarding time of year and level of disturbance, please refer to the table below.

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Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

CDFW-4 (cont'd)

Western Spadefoot (*Spea hammondi*) (WESP)

WESP was not included in species that may be present at the Project site or area. WESP, an SSC, inhabit grassland habitats, breed in seasonal wetlands, and seek refuge in upland habitat where they occupy burrows outside of the breeding season (Thomson et al. 2016). Therefore, this species has the potential to be present. Habitat loss and fragmentation from agricultural and urban development is the primary threat to WESP. Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around burrows. If WESP are observed on the Project site, CDFW recommends that Project activities in their immediate vicinity cease and individuals be allowed to leave the Project site on their own accord. Alternatively, a qualified biologist with appropriate take authorization can move them out of harm's way and to a suitable location.

CDFW-5

Coast Live Oak Woodland (*Quercus agrifolia/Adneostoma fasciculatum*) (CLO)

CEQA was amended to include Public Resources Code (PRC) Section 21083.4, which states that a county shall determine whether a project within its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment. If a county determines that there may be a significant effect to oak woodlands, the county shall require appropriate oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands. CDFW considers the removal of oaks in the Project area as significant and agrees with the County's significance determinations in the DEIR. However, CDFW recommends the county require oak mitigation as required by CEQA Section 21083.4 since the Project, as proposed, will remove high quality oak woodlands as part of this future development.

CDFW-6

In addition to the mitigation required by CEQA Section 21083.4, retaining large oak trees (greater than 12 inches in diameter as measured at breast height) on the Project site to the maximum extent possible is recommended during any construction activities. Large, acorn-bearing oak trees are a critical source of food for wintering deer and other wildlife, including migratory and resident birds. Location and routing of access roads, utility connections, septic systems and building sites where they will require the minimum amount of disturbance to large oak trees is advised.

CDFW-7

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Per Project information, approximately 78.3 acres of the 288-acre Project area (27%) is CLO woodland, specifically, the *Quercus agrifolia/Adenostoma fasciculatum* - (*Salvia mellifera*) association, which is a Global and State ranked (G3/S3) sensitive community and identified as a biologically significant resource by the County. It provides important native habitat for plants and wildlife.

The proposed project will result in the permanent loss of 75.3 acres of available CLO woodland habitat, approximately 96% of the CLO woodland on the site. The vast majority of all species found during biological surveys were in this oak woodland area. Only three acres would be preserved on-site per Project information. Considering edge effects around this small preserve, it is reasonable to assume that this large oak woodland area and the majority of the species it supports will almost certainly be destroyed by the construction of the proposed Project.

CLO woodland and, in particular, this CLO woodland/Burton mesa chapparal association contributes significantly to the Project area and the region's overall biological diversity, directly supporting eight special-status plants (Pismo clarkia (*Clarkia speciosa*), mesa horkelia (*Horkelia cuneata* var. *Puberula*), Nipomo Mesa ceanothus (*Ceanothus impressus* var. *Nipomensis*), mesa manzanita (*Arctostaphylos rudis*), Michael's rein orchid (*Platanthera michaelii*), California spineflower (*Mucronea californica*), sand almond (*Prunus fasciculata punctata*), and sand buckbrush (*Ceanothus cuneatus*)) and four special-status nesting birds which include (Cooper's hawk (*Accipiter cooperii*), oak titmouse *(Baeolophus inornatus*), white-tailed kite, and Nuttall's woodpecker *(Dryobates nuttallii))*.

Sensitive reptiles such as Blainville's (coast) horned lizard (*Phrynosoma blainvillii (coronata)*) are also supported by this habitat. California's Central Coast contains 80% of the state's CLO woodlands (Gaman 2008). This habitat type is considered sensitive due to its biological diversity and presence of sensitive plant and animal species; therefore, impacts would be considered significant, and mitigation should be a requirement to reduce project impacts. However, mitigation may not be feasible per Project information, and the DEIR goes on to say that potential impacts would be significant and unavoidable. CDFW believes a Class 1 impact is not acceptable due to the richness of this habitat area and association of CLO woodland and Burton Mesa chaparral and that a Conditional Use Permit (CUP) should not be issued until feasible mitigation is both identified, encumbered, and protected.

CDFW-8

I. Editorial Comments and/or Suggestions

Nesting birds: CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections referenced above.

CDFW-9

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To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e. nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction area would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

CDFW-9 (cont'd)

Federally Listed Species: CDFW recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to, monarch butterfly and CRLF, which were discussed in the previous comment letter for this project. Take under FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

CDFW-10

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be

CDFW-11

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mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link:

https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CDFW-11 (cont'd)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the County of San Luis Obispo Planning and Building Department in identifying and mitigating Project impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please see the enclosed Mitigation Monitoring and Reporting Program (MMRP) table which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Kelley Nelson, Environmental Scientist at (559) 580-3194 or Kelley.Nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Bob Stafford
5343A684FF02469...

for Julie A. Vance
Regional Manager

Attachments

ec: Office of Planning and Research, State Clearinghouse, Sacramento

Kelley Nelson
California Department of Fish and Wildlife

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REFERENCES

California Burrowing Owl Consortium (CBOC). 1993. Burrowing owl survey protocol and mitigation guidelines. April 1993.

California Department of Fish and Game (CDFG). 2012. Staff Report on Burrowing Owl Mitigation. California Department of Fish and Game. March 7, 2012

CDFW. 2022. Biogeographic Information and Observation System (BIOS). https://www.wildlife.ca.gov/Data/BIOS. Accessed July 7, 2022.

Gaman. 2008. Oak Woodland Conservation Management Planning in Southern CA – Lessons Learned.

Thomson, R. C., A. N. Wright, and H. Bradley Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife and University of California Press.

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Dana Reserve Specific Plan

SCH No.: 2021060558

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Mitigation Measure 1: BUOW Surveys	
Mitigation Measure 2: BUOW Passive Relocation and Mitigation	
Mitigation Measure 4: Western Spadefoot Surveys	
Mitigation Measure 6: Special-Status Species Habitat Assessment	
Mitigation Measure 8: Species-Specific Species Surveys	
Mitigation Measure 9: Special-Status Species Take Authorization	
During Construction	
Mitigation Measure 3: BUOW Avoidance	
Mitigation Measure 5: Western Spadefoot Avoidance	
Mitigation Measure 7: Special-Status Species Take Avoidance	

CDFW-12

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Attachment 2

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Ave
Fresno, California 93710
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Governor's Office of Planning & Research

July 23 2021

STATE CLEARINGHOUSE

July 23, 2021

Jennifer Guetschow
Project Manager
County of San Luis Obispo Planning and Building Department
976 Osos Street
San Luis Obispo, California 93401

Subject: Dana Reserve Specific Plan (Project)
Notice of Preparation (NOP) of an Environmental Impact Report (EIR)
SCH No.: 2021060558

Dear Ms. Guetschow:

The California Department of Fish and Wildlife (CDFW) received a NOP of an EIR from County of San Luis Obispo Planning and Building Department for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

CDFW-13

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

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CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: Dana Reserve, LLC

Objective: The Project consists of an adoption of a Specific plan, vesting master tentative tract map number 3149, conditional use permit, and development agreement for a phased master planned community. The objective of the Project is to define a guide for development of the Reserve, by defining land use and development standards for residential, commercial, and open space land uses.

Location: The Project area is located within the unincorporated area of San Luis Obispo County and adjacent to the Urban Reserve Line of the community of Nipomo. The cross streets are Willow Road and Highway 101. The Project is a total of 288-acres.

- Longitude: 35° 2' 43.59"; Latitude: -120° 30' 1.73"
- Assessor's Parcel Numbers: 091-301-073; 091-301-031; 091-301-030; 091-325-022; 091-301-029; 090-031-003

Timeframe: Unspecified

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist County of San Luis Obispo Planning and Building Department in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. There are many special-status resources present within and adjacent to the Project area. These resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities or land use changes.

CDFW-13 (cont'd)

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The NOP indicates there is potential for significant impacts unless mitigation measures are implemented, however, the measures listed are general and non-specific and/or may be inadequate to reduce impacts to less than significant. CDFW is concerned regarding potential impacts to special-status species including, but not limited to: Federal candidate Monarch butterfly (*Danaus plexippus pop. 1*), the State species of special concern and federally threatened California red-legged frog (*Rana draytonii*), State species of special concern American badger (*Taxidea taxus*), burrowing owl (*Athene cunicularia*), western spadefoot (*Spea hammondii)*, legless lizard (*Anniella pulchra*), coast horned lizard (*Phrynosoma blainvillii*), special-status bat species, and federally and State-listed special-status plant species.

In order to adequately assess any potential impacts to biological resources, CDFW recommends that focused protocol-level surveys be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features are present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, especially in the areas not in irrigated agriculture, and to identify any Project-related impacts under CESA and other species of concern.

Additionally, when an EIR is prepared, mitigation measures must be specific and clearly defined and cannot be deferred to a future time. The specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation, when an EIR is prepared. The CEQA document must provide quantifiable and enforceable measures as needed that will reduce impacts to less than significant levels.

CDFW-13
(cont'd)

I. Environmental Setting and Related Impact
Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS)?

COMMENT 1: Monarch Butterfly

Issue: Monarchs can be found overwintering along the California coast, specifically in non-native eucalyptus trees (Pelton 2016). Project-related activities have the potential to impact special-status species. Overwintering monarchs have been documented to occur near the Project area (CDFW 2021). CDFW recommends that the EIR includes an impact analysis on monarchs with the potential to occur in the Project area.

Specific impact: Without appropriate avoidance and minimization measures for the species mentioned above, potential significant impacts associated with the Project's construction include roost destruction, inadvertent entrapment, reduced reproductive

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success, reduction in health and vigor of eggs and/or young, and direct mortality of individual monarchs.

Evidence impact would be significant: During the last decade overwintering monarch populations have declined by nearly 90-percent (Jepsen et al. 2015). Habitat loss and fragmentation is among the primary threats to the population (USFWS 2020). Project activities have the potential to significantly impact the species by reducing possible roosting habitat.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts of the Project to special-status species, CDFW recommends conducting the following assessment of the Project area, including the following mitigation measures, and requiring them as conditions of approval in the Project's EIR.

Recommended Mitigation Measure 1: Monarch Butterfly Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment, well in advance of Project implementation, to determine if individual project area or its immediate vicinity contain habitat suitable to support monarchs.

Recommended Mitigation Measure 2: Monarch Butterfly Surveys

If suitable habitat is present, CDFW recommends assessing presence of monarchs by conducting surveys following recommended protocols or protocol-equivalent surveys.

Recommended Mitigation Measure 3: Monarch Butterfly Take Avoidance

Detection of monarchs within or in the vicinity of the Project area, warrants consultation with CDFW and USFWS to discuss how to implement ground-disturbing activities and avoid take.

CDFW-13 (cont'd)

COMMENT 2: American Badger

Issue: American badger are known to occur in the area near the Project site (CDFW 2021). Badgers occupy sparsely vegetated land cover with dry, friable soils to excavate dens, which they use for cover, and that support fossorial rodent prey populations (i.e. ground squirrels, pocket gophers, etc.) (Zeiner et al. 1990). The Project site may support these requisite habitat features. Therefore, the Project has the potential to impact American badger.

Specific impact: Without appropriate avoidance and minimization measures for American badger, potentially significant impacts associated with ground disturbance include direct mortality or natal den abandonment, which may result in reduced health or vigor of young.

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Evidence impact is potentially significant: Habitat loss is a primary threat to American badger (Gittleman et al. 2001). The Project has the expectation to promote the growth of the City of Nipomo, resulting in a high degree of land conversion and potential habitat fragmentation. As a result, ground-disturbing activities have the potential to significantly impact local populations of American badger.

Recommended Potentially Feasible Mitigation Measure(s):
To evaluate potential impacts to American badger associated with the Project, CDFW recommends conducting the following evaluation of the Project sites, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 4: American Badger Surveys

If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for American badger and their requisite habitat features (dens) to evaluate potential impacts resulting from ground- and vegetation-disturbance.

Recommended Mitigation Measure 5: American Badger Avoidance

Avoidance whenever possible is encouraged via delineation and observation of a 50-foot no-disturbance buffer around occupied dens and a 250-foot no-disturbance buffer around natal dens until it is determined through non-invasive means that individuals occupying the den have dispersed.

CDFW-13 (cont'd)

COMMENT 3: California Red-Legged Frog (CRLF)

Issue: CRLF primarily inhabit ponds but can also be found in other waterways including marshes, streams, and lagoons, and the species will also breed in ephemeral waters (Thomson et al. 2016). CRLF have been documented to occur in the vicinity of the Project site (CDFW 2021). The Project site contains upland habitat that may support the species. Avoidance and minimization measures are necessary to reduce impacts to CRLF to a level that is less than significant.

Specific impact: Without appropriate avoidance and minimization measures for CRLF, potentially significant impacts associated with the Project's activities include loss of upland refugia, inadvertent entrapment, destruction of eggs and oviposition (i.e., egg-laying) sites, degradation of water quality, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, and direct mortality of individuals.

Evidence impact would be significant: CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs are the primary threats to CRLF

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(Thomson et al. 2016, USFWS 2017). Project activities have the potential to significantly impact CRLF.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to CRLF, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 6: CRLF Surveys

CDFW recommends that a qualified wildlife biologist conduct protocol level surveys for CRLF in areas where potential habitat exists. CDFW recommends surveys in accordance with the "Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog" (USFWS 2005) to determine if the species is within or adjacent to the Project area. Please note that dip-netting would constitute take as defined by Fish and Game Code section 86, so it is recommended this survey technique be avoided. In addition, CDFW advises surveyors adhere to Appendix E "The Declining Amphibian Task Force Fieldwork Code of Practice," of the CDFW "Considerations for Conserving the Foothill Yellow-Legged Frog" (CDFW 2018a).

Recommended Mitigation Measure 7: CRLF Avoidance

If any CRLF are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (October 15 and May 1). When ground-disturbing activities must take place between October 15 and May 1, CDFW recommends a qualified biologist monitor construction activity daily for CRLF.

CDFW-13 (cont'd)

COMMENT 4: Burrowing Owl (BUOW)

Issue: The Project location is within the known range of BUOW and the species occurs throughout the area (CDFW 2021). BUOW inhabit open grassland or adjacent canal banks, rights-of-ways (ROWs), vacant lots, etc. containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Review of aerial imagery indicates that the Project site has annual grassland, thus BUOW has the potential to occur on the Project site.

Specific impact: Potentially significant direct impacts associated with subsequent activities include burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

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Evidence impact is potentially significant: BUOW rely on burrow habitat year-round for their survival and reproduction. Habitat loss and degradation are considered the greatest threats to BUOW in California (Gervais et al. 2008). The Project site is some of the only remaining undeveloped land in the vicinity, which is otherwise intensively managed for agriculture and residential use. Therefore, subsequent ground-disturbing activities associated with the Project have the potential to significantly impact local BUOW populations. In addition, and as described in CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), excluding and/or evicting BUOW from their burrows is considered a potentially significant impact under CEQA.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to BUOW, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 8: BUOW Surveys

CDFW recommends that a qualified biologist assess if suitable BUOW habitat features are present within or adjacent to the Project site (e.g., burrows). If suitable habitat features are present, CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's Staff Report on Burrowing Owl Mitigation" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable.

CDFW-13
(cont'd)

Recommended Mitigation Measure 9: BUOW Avoidance

CDFW recommends no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

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Recommended Mitigation Measure 10: BUOW Passive Relocation and Mitigation

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), exclusion is not a take avoidance, minimization, or mitigation method and is considered a potentially significant impact under CEQA. However, if necessary, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of 1 burrow collapsed to 1 artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting BUOW. BUOW may attempt to colonize or re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance, at a rate that is sufficient to detect BUOW if they return.

COMMENT 5: Western spadefoot

Issue: Western spadefoot inhabit grassland habitats, breed in seasonal wetlands, and seek refuge in upland habitat where they occupy burrows outside of the breeding season (Thomson et al. 2016). Review of aerial imagery indicates that the Project contains upland habitat and near vicinity of the site there are other habitat elements where the species could be supported.

CDFW-13 (cont'd)

Specific impact: Without appropriate avoidance and minimization measures for western spadefoot, potentially significant impacts associated with ground disturbance include; collapse of small mammal burrows, inadvertent entrapment, loss of upland refugia, water quality impacts to breeding sites, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact is potentially significant: Habitat loss and fragmentation resulting from agricultural and urban development is the primary threat to western spadefoot (Thomson et al. 2016). The Project area is within the range of western spadefoot, contains suitable upland habitat (i.e., grasslands interspersed with burrows) and near possible breeding sites (i.e., seasonal wetlands, vernal pools and swales). As a result, ground-disturbing activities associated with development of the Project site have the potential to significantly impact local populations of this species.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to western spadefoot associated with the Project, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

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Recommended Mitigation Measure 11: Western Spadefoot Surveys

CDFW recommends that a qualified biologist conduct focused surveys for western spadefoot and their requisite habitat features to evaluate potential impacts resulting from ground- and vegetation-disturbance.

Recommended Mitigation Measure 12: Western Spadefoot Avoidance

Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around burrows. If western spadefoot are observed on the Project site, CDFW recommends that Project activities in their immediate vicinity cease and individuals be allowed to leave the Project site on their own accord. Alternatively, a qualified biologist with appropriate take authorization can move them out of harm's way and to a suitable location.

COMMENT 6: Other Special-Status Species

Issue: Project-related activities have the potential to impact other special-status species. Northern California legless lizard, coast horned lizard, Pallid bat, Townsend's big-eared bat, and western mastiff bat has the potential to occur within the vicinity of the Project area (CDFW 2021). CDFW recommends that the CEQA document includes an impact analysis on all species with the potential to occur in the Project area including, but not limited to, these species listed above.

CDFW-13 (cont'd)

Specific impact: Without appropriate avoidance and minimization measures for the species mentioned above, potential significant impacts associated with the Project's construction include burrow or den collapse, nest or roost destruction, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individual special-status wildlife species.

Evidence impact would be significant: Habitat loss resulting from development is among the primary threats to special-status species. As a result, ground disturbance resulting from development of the Project has the potential to impact habitat that supports special-status species, which may result in significant impacts to local populations of these species.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts of the Project to special-status species, CDFW recommends conducting the following assessment of the Project area, including the following mitigation measures, and requiring them as conditions of approval in the Project's CEQA document.

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Recommended Mitigation Measure 13: Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment, well in advance of Project implementation, to determine if individual project areas or their immediate vicinity contain habitat suitable to support special-status plant or animal species, including, but not limited to, those mentioned above.

Recommended Mitigation Measure 14: Species-Specific Surveys

If suitable habitat is present, CDFW recommends assessing presence/absence of special-status species by conducting surveys following recommended protocols or protocol-equivalent surveys. Recommended protocols vary by species. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols).

Recommended Mitigation Measure 15: Take Avoidance

Detection of special-status plant or animal species within or in the vicinity of the Project area, warrants consultation with CDFW to discuss how to implement ground-disturbing activities and avoid take.

Recommended Mitigation Measure 16: Take Authorization

In the case of State-listed species, detection warrants consultation with CDFW to discuss how to avoid take, or if avoidance is not feasible, to acquire an incidental take permit (ITP) prior to ground-disturbing activities, pursuant to Fish and Game Code section 2081 subdivision (b).

CDFW-13 (cont'd)

COMMENT 7: Special-Status Plant Species

Issue: Several special-status plant species have been documented to occur within and near the vicinity of the Project area (CDFW 2021). The Project site contains habitat suitable to support numerous special-status plant species meeting the definition of rare or endangered under CEQA Guidelines Section 15380 including, but not limited to, the federally endangered and state threatened La Graciosa thistle (*Cirsium scariosum var. loncholepis*) and the federally endangered and State Rare Pismo clarkia (*Clarkia speciosa ssp. immaculata*). The NOP states that these species may be impacted, but does not list any mitigation measures to reduce impacts to a level that is less than significant. CDFW recommends that the EIR includes an impact analysis on all species with the potential to occur in the Project area including, but not limited to, these species listed above.

Specific impact: Without appropriate avoidance and minimization measures for special-status plants, potential significant impacts resulting from ground- and vegetation-

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disturbing activities associated with Project construction include inability to reproduce and direct mortality.

Evidence impact would be significant: Special-status plant species known to occur in the vicinity of the Project site are threatened by residential development, road maintenance, vehicles, grazing, trampling, and invasive, non-native plants (CNPS 2021), all of which may be unintended impacts of the Project. Therefore, impacts of the Project have the potential to significantly impact populations of the species mentioned above.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to special-status plant species associated with the Project, CDFW recommends conducting the following evaluation of the Project area, editing the IS/MND to include the following additional measures, and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 17: Special-Status Plant Surveys

If suitable habitat is present, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities" (CDFW 2018). This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

CDFW-13 (cont'd)

Recommended Mitigation Measure 18: Special-Status Plant Avoidance

CDFW recommends that special-status plant species be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

Recommended Mitigation Measure 19: State-Listed Plant Take Authorization

If a plant species listed pursuant to CESA or State designated as rare is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground-disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code section 2081 subdivision (b) for State listed threatened or endangered plants or pursuant to the Native Plant Protection Act and Fish and Game Code section 1900 et seq. for State designated rare plants.

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II. Editorial Comments and/or Suggestions

Nesting birds: CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e. nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

CDFW-13 (cont'd)

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction area would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Federally Listed Species: CDFW recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to, monarch butterfly and CRLF. Take under FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or

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supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist County of San Luis Obispo Planning and Building Department in identifying and mitigating Project impacts on biological resources.

CDFW-13
(cont'd)

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please see the enclosed Mitigation Monitoring and Reporting Program (MMRP) table which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Aimee Braddock, Environmental Scientist at (559) 977-3352 or aimee.braddock@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Bob Stafford
5343A684FF02469...
Julie A. Vance
Regional Manager

Attachments
A. MMMRP for CDFW Recommended Mitigation Measures

cc: Office of Planning and Research, State Clearinghouse, Sacrament

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REFERENCES

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CDFW-13 (cont'd)

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CDFW-13
(cont'd)

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
(MMRP)

PROJECT: Dana Reserve Specific Plan

SCH No.: 2021060558

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Mitigation Measure 1: Monarch Butterfly Habitat Assessment	
Mitigation Measure 2: Monarch Butterfly Surveys	
Mitigation Measure 4: American Badger Surveys	
Mitigation Measure 6: CRLF Surveys	
Mitigation Measure 8: BUOW Surveys	
Mitigation Measure 10: BUOW Passive Relocation and Mitigation	
Mitigation Measure 11: Western Spadefoot Surveys	
Mitigation Measure 13: Special-Status Species Habitat Assessment	
Mitigation Measure 14: Species-Specific Species Surveys	
Mitigation Measure 16: Special-Status Species Take Authorization	
Mitigation Measure 17: Special-Status Plant Surveys	
Mitigation Measure 19: State-Listed Plant Take Authorization	
During Construction	
Mitigation Measure 3: Monarch Butterfly Take Avoidance	
Mitigation Measure 5: American Badger Avoidance	
Mitigation Measure 7: CRLF Avoidance	
Mitigation Measure 9: BUOW Avoidance	

CDFW-13
(cont'd)

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Jennifer Guetschow, Project Manager
County of San Luis Obispo Planning and Building Department
July 23, 2021
Page 17

Mitigation Measure 12: Western Spadefoot Avoidance	
Mitigation Measure 15: Special-Status Species Take Avoidance	
Mitigation Measure 18: Special-Status Plant Avoidance	

CDFW-13
(cont'd)

9.2.13.1 Response to Letter from California Department of Fish and Wildlife

Comment No.	Response
CDFW-1	The comment summarizes CDFW's role as a responsible agency and states CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. No changes to the Draft EIR are required in response to this comment.
CDFW-2	The comment provides a summary of the project description. No changes to the Draft EIR are required in response to this comment.
CDFW-3	The comment states that without appropriate mitigation measures, project activities conducted within occupied territories have the potential to significantly impact State fully protected white-tailed kite. CDFW recommends that a qualified biologist conduct a habitat assessment in advance of project implementation to determine if the project site or its vicinity contains suitable habitat for fully protected raptors. CDFW also recommends that focused surveys be conducted by experienced biologists prior to project implementation in accordance with protocols developed by CDFW. In the event this species is found within 1/2 mile of the project site, CDFW has recommended avoidance measures. Impacts to white-tailed kite are discussed under BIO Impact 7 in Section 4.4, *Biological Resources*, in the EIR. As discussed therein, special-status birds and raptors, such as white-tailed kite, may be adversely affected by the loss of nesting and foraging habitat in oak and chaparral habitats. Loss of grassland habitat could adversely affect foraging raptors and ground nesting birds. Incremental habitat loss on a regional scale may adversely affect special-status birds. The EIR requires protection of habitat off-site to minimize these impacts (see Mitigation Measures BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4). Mitigation Measure BIO/mm-7.1 has also been identified to require nesting bird preconstruction surveys and appropriate nest avoidance. BIO/mm-7.1 has been modified to incorporate the related protections identified by CDFW. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to white-tailed kite would be less than significant with mitigation (Class II).
CDFW-4	The comment states that burrowing owl could be present in the project area between the time negative surveys were conducted and the time the project will be constructed and potentially significant impacts from construction could occur. CDFW recommends surveys be conducted by a qualified biologist following the California Burrowing Owl Consortium's Burrowing Owl Survey Protocol and Mitigation Guidelines and CDFW's Staff Report on Burrowing Owl Mitigation. CDFW recommends no-disturbance buffers. As stated in Section 4.4.1.1.7, *Special-Status Wildlife Species*, under *Burrowing Owl*, due to the presence of ground squirrel burrows and grazed perennial grassland in the project area, the site could support burrowing owls. Mitigation Measure BIO/mm-7.1 has been revised to clarify these requirements apply to burrowing owl.
CDFW-5	The comment states that western spadefoot was not included in the species that may be present at the project site or area but has the potential to be present. Appendix E to the EIR, Biological Resources Background Information, on page D-6 of the Biological Report for the Dana Reserve Specific Plan, analyzed the potential for western spadefoot to occur in the project area. The analysis determined there was no potential for this species to occur due to the absence of suitable habitat. Therefore, potential impacts to this species would not occur; no changes to the EIR are necessary in response to this comment.
CDFW-6	Please see Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CDFW-7	The comment states that in addition to the mitigation required by CEQA Section 21083.4, retaining large oak trees (greater than 12 inches in diameter as measured at breast height) on the project site to the maximum extent possible is recommended during any construction activities. Mitigation Measure BIO/mm-18.3 has been revised to clarify that large oak trees shall be protected to the greatest extent possible. In addition, minor project modifications have been made since circulation of the Draft EIR to avoid impacts to approximately 858 additional oak trees within the Specific Plan Area. These modifications are more fully described in Chapter 10. No additional changes to the EIR are necessary in response to this comment.
CDFW-8	Please see Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, in Section 9.1, above. No additional revisions to the EIR are required in response to this comment.

Comment No.	Response
CDFW-9	The comment states that CDFW encourages that project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the project applicant is responsible for ensuring that implementation of the project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections. Impacts to special-status birds, raptors, and nesting birds are discussed under BIO Impact 7 in Section 4.4, *Biological Resources*, in the EIR. As discussed therein, the proposed development would affect common and special-status nesting birds by removing coast live oak woodland, perennial grassland, and Burton Mesa chaparral. Loss of coast live oak woodland particularly affects cavity nesting species, such as woodpeckers, wrens, northern flicker (*Colaptes auratus*), and oak titmouse, as well as canopy nesting species, such as raptors, Hutton's vireo (*Vireo huttoni*), California scrub-jay (*Aphelocoma californica*), chestnut-backed chickadee (*Poecile rufescens*), western bluebird (*Sialia mexicana*), and tree swallow (*Tachycineta bicolor*). Two USFWS BCC identified in the project area could be adversely affected from oak woodland removal: Nuttall's woodpecker and oak titmouse. The potential for habitat removal to adversely affect nesting birds can be reduced. Measure BIO/mm-7.1 has also been identified to require nesting bird preconstruction surveys and appropriate nest avoidance for any construction activities taking place between February 1 and September 15, consistent with this comment. The requirement that these surveys take place within 1 week prior to ground disturbing activities has been revised to reflect 10 days, consistent with this comment. BIO/mm-7.1 has also been revised to include a requirement for surveying a sufficient buffer area to the extent feasible and that a 250-foot buffer for active nests be implemented unless the qualified biologist recommends a buffer decrease based on an identified set of performance criteria. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to nesting birds would be less than significant with mitigation (Class II).
CDFW-10	The comment recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to, monarch butterfly and CRLF, which were discussed in the previous comment letter for this project. The EIR has fully evaluated potential project impacts on federally listed species; however, the USFWS does not have regulatory jurisdiction over the project, since the project site does not support federally protected wildlife species. The County has had information conversations and a meeting with USFWS to discuss potential project impacts and will continue to evaluate potential impacts to federally listed species and will coordinate with all appropriate regulatory agencies. No changes to the EIR are required in response to this comment.
CDFW-11	The comment requests that any special-status species and natural communities detected during project surveys be reported to the California Natural Diversity Database (CNDDB). The comment states that the project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. These procedural requirements are noted. No changes to the environmental document are necessary in response to this comment.
CDFW-12	The comment includes the California Department of Fish and Wildlife Recommended Mitigation Monitoring and Reporting Program (MMRP) as Attachment 1. Refer to Responses to Comments CDFW-3, CDFW-4, and CDFW-5, above. No changes to the environmental document are necessary in response to this comment.
CDFW-13	The comment has included the CDFW comment letter provided in response to the NOP, dated July 23, 2021, as Attachment 2. These comments were reviewed and addressed as part of preparation of the Draft EIR, as indicated in page 3 of the comment letter. No changes to the environmental document are necessary in response to this comment.

9.3 NON-AGENCY ORGANIZATION COMMENT LETTERS AND RESPONSES

The following non-agency organizations have submitted comments on the Draft EIR.

Table 9.3-1. Non-Agency Organization Comments

Respondent	Code	Contact Information	Page
California Wildlife Foundation / California Oaks Coalition Letter dated: 07/27/2022	CWF/CO	201 University Avenue, H-43 Berkeley, CA 94710 *Contact: Janet Cobb, Executive Officer, CWF* *Angela Moskow, Manager, CO*	9.3-3
League of Women Voters of San Luis Obispo County Letter dated: 07/27/2022	LWV	4111 Broad Street San Luis Obispo, CA 93401 *Contact: Cindy-Marie Absey, President; Neil Havlik, Co-Chair, Natural Resources Committee; and Kim Murry, Co-Chair, Natural Resources Committee*	9.3-14
Nipomo Recreation Association Letter dated: 07/29/2022	NRA	261 W Dana Street Nipomo, CA 93444 *Contact: Jeff Long, CEO/Executive Director*	9.3-21
Sierra Club Santa Lucia Chapter Letter dated: 07/29/2022	SCSLC	P.O. Box 15755 San Luis Obispo, CA 93406 *Contact: Andrew Christie, Director*	9.3-23
California Native Plant Society Letter dated: 07/30/2022	CNPS	San Luis Obispo Chapter P.O. Box 784 San Luis Obispo, CA 93406 *Contact: Melissa Mooney, President*	9.3-32
Nipomo Native Garden Letter dated: 07/30/2022	NNG	999 Osage Street, #927 Nipomo, CA 93444 *Contact: Cynthia Jelinek, President*	9.3-59
Californians for Homeownership Letter dated: 08/01/2022	CFH	525 South Virgil Avenue Los Angeles, CA 90020 *Contact: Matthew Gelfand, Counsel*	9.3-64
Coalition of Labor Agriculture & Business of San Luis Obispo County Letter dated: 08/01/2022	COLAB	PO Box 13601 San Luis Obispo, CA 93406 *Contact: Michael Brown, Government Affairs Director*	9.3-67
Healthy Communities Work Group Letter dated: 08/01/2022	HCWG	2180 Johnson Avenue San Luis Obispo, CA 93401 *Contact: Kealoha Ghiglia, REHS, Chair*	9.3-94
Home Builders Association of the Central Coast Letter dated: 08/01/2022	HBA	P.O. Box 748 San Luis Obispo, CA 93406 *Contact: Lindy Hatcher, Executive Director*	9.3-97
Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law) Letter dated: 08/01/2022	SWRCC	139 South Hudson Avenue, Suite 200 Pasadena, California 91101 *Contact: Mitchell M. Tsai, Attorney at Law*	9.3-99
Environmental Center of San Luis Obispo Letter dated: (undated)	ECOSLO	1012 Pacific Street, Suite B-1 San Luis Obispo, CA 93401 *Contact: Grant Helete, Community Organizer*	9.3-376

Respondent	Code	Contact Information	Page
Northern Chumash Tribal Council Letter dated: (undated)	NCTC	1590 18th Street, #1831 Los Osos, CA 93402 *Contact: Violet Sage Walker, Chairwoman*	9.3-378

9.3.1 California Wildlife Foundation / California Oaks Coalition

California Wildlife Foundation/California Oaks, 201 University Avenue, H-43 Berkeley, CA 94710, (510) 763-0282

July 27, 2022

Jennifer Guetschow
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (PLN- 1118, SUB2020-00047, LRP2020-00007, ED21-094)

Transmitted via email: jguetschow@co.slo.ca.us

Dear Ms. Guetschow:

The California Oaks program of California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, providing plant and wildlife habitat, and sustaining cultural values. This letter follows the July 15, 2021 comments that California Wildlife Foundation/California Oaks (CWF/CO) submitted on the Dana Reserve Specific Plan Initial Study.

CWF/CO reviewed the Draft Environmental Impact Report (DEIR), focusing our attention on the project's impacts on the site's oak communities. CWF/CO has reached the conclusion that the County of San Luis Obispo should not advance this project, which will degrade the county's biodiversity while not necessarily advancing affordable housing.[1] **CWF/CO-1**

The **no project alternative** should be the **preferred alternative** because of proposed removal of over 3,943 oak trees, including 96% of the site's coast live oak woodland, which supports imperiled biodiversity; inadequate mitigation, including the possibility that suitable coast live oak woodland habitat within the range of Burton Mesa chaparral mitigation habitat may not be available in the county; many inconsistencies with county habitat protection policies; the conclusion of the DEIR (BIO Impact 19) that off-site transportation improvements and/or trenching of new water and wastewater pipelines could result in additional oak tree impacts; and the conclusion of the DEIR (BIO Impact 20) that development would induce substantial unplanned population growth on the Nipomo Mesa with additional cumulative impacts.[2] **CWF/CO-2**

[1] Page 70 of the Executive Summary of the DEIR states: *However, based on the clustered development and other site constraints, this alternative may not meet project goals for the provision of affordable market rate housing units.*
[2] The discussion of "over" 3,943 reflects the omission of trees smaller than 4 inches at breast height in the calculation of tree removals.

Lastly, the Greenhouse Gas (GHG) Emissions chapter (4-8) fails to analyze or propose to mitigate for the impacts of proposed tree removals. CWF/CO-3

Environmental impacts will degrade unique and irreplaceable San Luis Obispo County oak habitat and proposed mitigation is inadequate: The project proposes to remove greater than 3,943 oaks growing in woodland, forest, and Burton Mesa chaparral and grassland habitat. A great deal of the proposed mitigation for the oak impacts is meant to be accomplished through conservation of lands on Dana Ridge, which the DEIR states is of lower biological value than the land that the project would impact. Page 42 of the Biological Resources Chapter notes this deficiency (underline is used for emphasis):

> **Policy BR 1.9 Preserve Ecotones.** Require that proposed discretionary development protects and enhances ecotones, or natural transitions between habitat types because of their importance to vegetation and wildlife. Ecotones of particular concern include those along the margins of riparian corridors, baylands and marshlands, vernal pools, and woodlands and forests where they transition to grasslands and other habitat types.
>
> **Potentially Inconsistent.** It is currently unknown whether it would be feasible to locate and preserve coast live oak woodland within the range of Burton Mesa chaparral, as required by mitigation measure BIO/mm 13.1, because that combination of habitats is not a common occurrence. It is within this unique transitional area where certain special-status plant species thrive. Similar ecotones will be preserved on the Dana Ridge Mitigation Site, <u>but it does not preserve the same habitat types or support the same woodland species.</u>

CWF/CO-4

Page 74 of the Biological Resources Chapter of the DEIR provides further clarification of the problem, including discussion of the vegetation matrix that the project proposes to destroy and the possibility that the proposed mitigation strategy may not be feasible (underline is used for emphasis):

> ***BIO Impact 15: The project will directly impact coast live oak woodland. Impacts would be significant and unavoidable (Class I).***
>
> Approximately 78.3 acres of the project area consists of coast live oak woodland. The proposed development will remove 75.3 acres (approximately 96%) and preserve 3 acres (approximately 4%) of this habitat on-site. The *Quercus agrifolia*/*Adenostoma fasciculatum* – (*Salvia mellifera*) alliance has a Global/State rank of G3/S3 and is considered a sensitive natural community by the CDFW (CDFW 2021b). Therefore, loss of almost all (approximately 96%) *Quercus agrifolia*/*Adenostoma fasciculatum* – (*Salvia mellifera*) habitat would be considered significant, and mitigation is necessary to reduce project impacts. On-site mitigation opportunities are limited; therefore, off-site conservation and restoration would be required to fully mitigate for project impacts.

> County COSE Policy BR 3.3.1 requires the maintenance of the integrity and diversity of oak woodlands, chaparral communities, and other significant vegetation as part of the compliance with the Oak Woodlands Preservation Act (PRC Section 21083.4). The coast live oak woodland in the project area regularly integrates with the Burton Mesa chaparral. The main difference between the designation of Burton Mesa chaparral and coast live oak woodland is that the canopy threshold of coast live oak trees does not exceed 20% absolute cover. Other than this, these two vegetation communities are virtually identical in terms of species composition. Many of the species described within Burton Mesa chaparral are also present in coast live oak woodland and vice versa. These two vegetation communities, along with the coast live oak forest and California native perennial grassland, create a habitat matrix that, when left intact, supports a wide range of native and special-status species. Specifically, this diverse habitat supports a unique assemblage of nine special-status plants, most of which are highly endemic to coastal communities in San Luis Obispo and Santa Barbara Counties. In order to maintain the diversity of oak woodlands in the County, per County COSE Policy BR 3.3.1, mitigation for coast live oak woodlands should occur adjacent to the conservation/restoration of Burton Mesa chaparral on sites with sandy soil conditions suitable to support the special-status plant species that occur in the project area. This would effectively maintain and/or recreate the habitat matrix that supports the unique assemblage of species that would be lost as a result of the proposed project. However, implementation of this mitigation may not be feasible; therefore, potential impacts would be *significant and unavoidable*.

CWF/CO-4 (cont'd)

The Biological Resource's chapter's discussion on pages 73 and 74 of BIO Impact 14 notes that the applicant may fulfill half of the mitigation requirement through Restoration of Mesa chaparral in Santa Barbara County. The trade-off of San Luis Obispo County's unique biological resources for a housing development that may not achieve affordable housing goals is not supportable. Further, the Biological Resource chapter's discussion on page 95 of BIO Impact 20 indicates additional anticipated development will further degrade remaining sensitive vegetation areas that support threatened and endangered plant populations, as noted below.

CWF/CO-5

The DEIR also discusses wildlife habitat provided by the site's oak woodlands, noting that analysis conducted to-date has not been adequate to determine the presence of some special status species (page 6 of Executive Summary). (Underlined text is added for emphasis.):

> Coast live oak woodland habitat within the Specific Plan Area supports Blainville's (Coast) horned lizard (*Phrynosoma blainvillii*), a CDFW SSC (CDFW 2022), which was observed on-site during surveys (Althouse and Meade 2022a). The following special-status species are also supported by coast live oak woodland habitat but are unlikely to be observed without appropriately timed focused surveys: northern California legless lizard, pallid bat, silver-haired bat, western red bat, hoary bat, Yuma myotis. USFWS BCC observed in oak

CWF/CO-6

3

> woodlands include the cavity-nesting oak titmouse and Nuttall's woodpecker (USFWS 2008). Coast live oak woodlands support many songbirds, raptors, and common rodents, such as mice, voles, and woodrats. Oak tree canopies, cavities, and loose bark may provide roosting habitat for multiple bat species, including little brown bat and California myotis.

CWF/CO-6 (cont'd)

Project impacts to the oak forest and plants and wildlife dependent upon the habitat are also profound, as described on page 82 of the Biological Resources chapter:

> The project will result in the permanent loss of up to 21.7 acres in the proposed plan of available coast live oak forest habitat. Approximately 17.0 acres of coast live oak forest will be protected as a biological open space easement on site. The remaining 21.9 acres the coast live oak forest and remnant woodland patches would be indirectly impacted by recreational activities from the surrounding community, the invasion of non-native species used in landscaping, and regular fire fuel management activities that would occur within a 100-foot buffer of any structures.
>
> Coast live oak forest contributes significantly to the project area's overall biological diversity, indirectly supporting eight special-status plants (Pismo clarkia, mesa horkelia, Nipomo Mesa ceanothus, mesa manzanita, Michael's rein orchid, California spineflower, sand almond, and sand buck brush) and directly supporting four special-status nesting birds (Cooper's hawk, oak titmouse, white-tailed kite, and Nuttall's woodpecker). Sensitive reptiles such as Blainville's horned lizard are also supported by this habitat. California's Central Coast contains 90% of the state's coast live oak forests (Gaman 2008). This habitat type is considered sensitive due to its biological diversity and presence of sensitive plant and animal species; therefore, impacts are considered significant, and mitigation is required to reduce project impacts.

CWF/CO-7

Additional inconsistencies with San Luis Obispo County policies: The project also results in a net loss of oak trees, which is inconsistent with Biological Resources Policy 1.4 No Net Loss. The DEIR conclusion that there is a "potential" inconsistency in the proposal to remove greater than 3,943 oak trees and to replant 194 trees is intellectually dishonest. As described on page 42 of the DEIR's Executive Summary: "Of the 3,943 oak trees to be removed, Mitigation Measure BIO/mm-17.2 only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the County." The replacement trees will require many years to reach maturity and, if the restoration is successful, replace the habitat value of the trees that are meant to be removed. Further, the mitigation strategy does not include a plan for the lost ecosystem services as the trees mature, nor does it mitigate for GHG impacts of the tree removals, as discussed below.

CWF/CO-8

Among the project's many other inconsistencies with San Luis Obispo County policies, the General Plan Conservation and Open Space Element's Biological Resources Goal 1 is that "native habitat and biodiversity will be protected, restored, and enhanced." Again, the DEIR

CWF/CO-9

describes the native oak tree impacts as "potentially inconsistent" when the proposal clearly runs counter to this goal.

CWF/CO-9 (cont'd)

The DEIR continues to characterize "potential inconsistencies" with the following Biological Resource policies from the General Plan (see pages 4 and pages 41-44 of the Biological Resources chapter of the DEIR) despite the proposal's clear plan to violate these policies:

> **Policy BR 3.1 Native tree protection.** Protect native and biologically valuable trees, oak woodlands, trees with historical significance, and forest habitats to the maximum extent feasible.
>
> **Policy BR 3.2 Protection of native trees in new development.** Require proposed discretionary development and land divisions to avoid damage to native trees (e.g., Monterey Pines, oaks) through setbacks, clustering, or other appropriate measures. When avoidance is not feasible, require mitigation measures.
>
> **Policy BR 3.3 Oak Woodland Preservation.** Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity, and wildlife habitat.
>
> **Policy BR 1.2 Limit development impacts.** Regulate and minimize proposed development in areas that contain essential habitat for special-status species, sensitive natural communities, wetlands, coastal and riparian habitats, and wildlife habitat and movement corridors as necessary to ensure the continued health and survival of these species and protection of sensitive areas.
>
> **Policy BR 2.6 Development impacts to listed species**. Ensure that potential adverse impacts to threatened, rare, and endangered species from development are avoided or minimized through project siting and design. Ensure that proposed development avoids significant disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species. When avoidance is not feasible, require no net loss of sensitive natural plant communities and critical habitat areas.

CWF/CO-10

The proposed project is also inconsistent with County of San Luis Obispo Inland Land Use Ordinance (Title 22) Section 22.98.072(H)(1)(e) Landscaping: "Retain and incorporate existing vegetation as much as feasible into the subdivision design." (See pages 47-48 of Biological Resources chapter of DEIR.)

As noted in CWF/CO's July 2021 letter, section 4.5 of the South County Area Plan addresses the site's oak woodland: "The property has a large oak woodland that should be evaluated for preservation as a long-term habitat." The letter also referenced San Luis Countywide Design Guidelines, which specify that development should conserve special areas identified as having high ecological sensitivity, listing oak woodlands as examples of natural resources to preserve: "Development should be designed to preserve and protect existing native trees on site if

feasible."[3] Lastly, the letter referenced San Luis Obispo County's Voluntary Oak Management Plan, which states: "Fragmented habitats provide fewer values for the plant and animal species that remain, increasing competition for resources, and isolating populations, which can lead to a decrease in both plant and animal diversity."[4] The proposed oak destruction has risen, since the Initial Study was released, from greater than one third of the site's oaks to greater than three quarters (76%). **CWF/CO-11** **CWF/CO-12**

Additional impacts: The proposed removal of greater than 3,943 oaks—1,073 from oak forest, 2,676 from oak woodland, and 194 from Burton Mesa chaparral and grassland habitat—is, according to the discussion of BIO Impact 19 on page 93 of the Biological Resources chapter of the DEIR, not representative of the full extent of oak removals that would result from the build-out of the proposed project: "Off-site transportation improvements and/or trenching of new water and wastewater pipelines could result in direct and indirect impacts to oak trees."

Cumulative impacts resulting from loss of open space and associated habitat from development generated by the proposed project will further degrade San Luis Obispo County's biodiversity, as articulated in the discussion of BIO impact 20 on page 95 of the Biological Resource's chapter:

> Several of the projects occur on or in the vicinity of a limited number of potential mitigation areas for Burton Mesa chaparral on the Nipomo Mesa (Figure 4.4-14). Each project individually may not have a significant impact on this natural community or the plant species that rely on it, such as mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita. However, considered collectively with the proposed project, these projects could potentially be significant in preventing the recovery of this natural community or these species on the Nipomo Mesa. **CWF/CO-13**
>
> The construction of the DRSP would result in significant cumulative impacts to Burton Mesa chaparral and coast live oak woodland and the rare plant species that are endemic to these areas, such as the Nipomo Mesa ceanothus and mesa horkelia. The project would induce substantial unplanned population growth on the Nipomo Mesa. The addition of new commercial infrastructure that supports residential developments (e.g., grocery stores, gas stations, etc.) will increase the appeal for additional homes to be built in rural residential areas on the Nipomo Mesa, thus further reducing and degrading remaining sensitive vegetation areas that support threatened and endangered plant populations. Therefore, the project would result in a *significant and unavoidable cumulative impact* to biological resources

DEIR does not analyze nor provide mitigation for greenhouse gas impacts of tree removals: Chapter 4-8, GHG Emissions, and Appendix D, Air Quality and Greenhouse Gas Emissions Background Information, have no discussion of the GHG emissions of the proposed tree **CWF/CO-14**

[3] See 1 and 99.
[4] See 10.

6

removals. The only discussion of trees is about attempts to avoid tree damage in constructing roadway infrastructure and the cooling and shading attributes of trees that will be planted—with no discussion of the heating impacts of the proposed tree removals.

CWF/CO-14 (cont'd)

California requires the analysis and mitigation of greenhouse gas emissions associated with proposed oak woodland or forest conversions. California Environmental Quality Act's (CEQA) sole GHG focus is "the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." Net present value of GHG emissions forms the foundation of the state's greenhouse reduction objectives, as well as the California Forest Protocol preservation standards. Every ton of carbon dioxide (CO_2) released into the atmosphere by oak woodland or forest conversion represents a measurable potential adverse environmental effect, which is covered by CEQA.

CWF/CO-15

If this ill-conceived project advances, it is necessary to include mitigation for these impacts. Mitigation that is based on the preservation ("avoided conversion") of existing natural lands does not adequately mitigate GHG emissions of natural lands conversion. Existing trees, understory, and soil conserved by the mitigation, do not, suddenly, upon the protections afforded by their conservation sequester more carbon to mitigate impacted biomass GHG emission effects of the conversion.

CWF/CO-16

The proposed project runs counter to necessary steps to protect biodiversity and carbon sequestration, which are articulated in many San Luis Obispo County policies. The proposed retention and installation of trees along the highway to create a "visual screening zone" (AES/mm-3.1) is reminiscent of clear-cut practices of the timber industry—window dressing for a project that would unravel vital habitat without addressing the state's affordable housing crisis. This project must not go forward as proposed.

CWF/CO-17

Thank you for your consideration of our comments.

Sincerely,

Janet Cobb
Executive Officer
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Angela Moskow
Manager
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cc: Neil Havlik, PhD, California Native Plant Society, neilhavlik@aol.com
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9.3.1.1 Response to Letter from California Wildlife Foundation / California Oaks Coalition

Comment No.	Response
CWF/CO-1	The comment asserts that the County of San Luis Obispo should not advance this project because it will degrade the county's biodiversity while not necessarily advancing affordable housing. The EIR identified a significant and unavoidable impact to oak woodlands due to the loss of diversity of oak woodlands in the County (BIO Impact 15), consistent with this comment. The statement that the project would not necessarily advance affordable housing is inaccurate; the referenced page 70 of the *Executive Summary* relates to Alternative 3 (the identified Environmental Superior Alternative), not the proposed project, which would advance the County's affordable housing goals. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-2	The comment states that the no project alternative should be the preferred alternative due to the impacts to oak trees, inadequate mitigation, inconsistencies with County habitat protection policies, off-site impacts to oak trees, and unplanned population growth with additional cumulative impacts. The comment speaks to the merits of the project vs. the no project alternative but does not raise specific questions about the adequacy of the environmental analysis. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the analysis of comparative impacts to those resources under a range of different project alternatives. The decision-making body will review all of the alternatives and comments received in response to the Draft EIR for consideration prior to selecting a preferred alternative and approving the project. No changes to the environmental document are necessary in response to this comment.
CWF/CO-3	The comment states that the Greenhouse Gas chapter (Section 4.8) fails to analyze or propose mitigation for the impacts of proposed tree removals. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.
CWF/CO-4	The comment asserts that environmental impacts will degrade unique and irreplaceable San Luis Obispo County oak habitat and proposed mitigation is inadequate. As discussed in Section 4.4, *Biological Resources*, impacts to oak habitat (BIO Impact 15 and BIO Impact 18) are considered significant. Mitigation, including off-site mitigation for coast live oak woodland, preparation of an on-site tree protection plan for trees to be retained, preparation of a tree replacement plan, protection for on-site oak woodland resources intended to be retained and preserved on-site, and off-site preservation has been included to address impacts to oak resources. The comment inaccurately asserts that land to be preserved at Dana Ridge is of lower biological value than the land that would be impacted. The oak woodland and chamise chaparral habitat to be preserved at Dana Ridge is of very high quality, equal to or exceeding that at the project site. However, it is not the exact same type or mix/matrix of habitat that would be impacted at the project site; therefore, the EIR concluded that it was not in-kind mitigation that would fully mitigate impacts. Impacts to on-site oak woodland alone could potentially be mitigated to less than significant within the County, and impacts to the on-site degraded Burton Mesa chaparral alone could potentially be mitigated to less than significant within the County. However, the areas in which the two interact in the same way they do at the Dana Reserve are very limited; therefore, no feasible mitigation was available to reduce this combined impact and, thus, no such mitigation is being proposed. Impacts were identified as significant and unavoidable. As detailed in Section 4.4, mitigation would reduce direct and indirect impacts to coast live oak woodland, coast live oak forest, and individual oak trees; however, due to the potential infeasibility of mitigation, the significant net loss of oak trees and acreage of oak woodlands in the county, and lack of proper in-kind preservation and restoration of coast live oak woodland habitat on similar soil types and in an elevation range similar to the project area, residual impacts are still considered significant and unavoidable (Class I). A range of project alternatives was evaluated in Chapter 5, *Alternatives Analysis,* to address the project's significant and unavoidable impacts. The No Project Alternative and Alternatives 2, 3, and 4 would all result in reduced impacts to biological resources compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP, which included revisions to the proposed project to reduce potential impacts to oak trees.

Comment No.	Response
CWF/CO-5	The comment states the trade-off of San Luis Obispo County's unique biological resources for a housing development that may not achieve affordable housing goals is not supportable. The statement that the project would not necessarily advance affordable housing is inaccurate (refer to Response to Comment CWF/CO-1 above). Additionally, BIO Impact 14 identified a significant and unavoidable impact related to the loss of Burton Mesa chaparral, in part, because mitigation in Santa Barbara County would not be in-kind or adequate to reduce potential impacts to less than significant levels, consistent with this comment. Refer also to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-6	The comment refers to the DEIR discussion of wildlife habitat provided by the site's oak woodlands, noting that analysis conducted to date has not been adequate to determine the presence of some special-status species. The DEIR states that the coast live oak woodland habitat within the Specific Plan Area supports Blainville's (coast) horned lizard, which was observed on-site during surveys. The DEIR acknowledges that the coast live oak woodland habitat within the Specific Plan Area has the potential to also support the following special-status species which were not observed during surveys and were determined unlikely to be observed without appropriately-timed focused surveys: northern California legless lizard, pallid bat, silver-haired bat, western red bat, hoary bat, and Yuma myotis. As discussed in Section 4.4, *Biological Resources*, focused surveys were conducted for these species within the Specific Plan Area. No northern California legless lizards were encountered during 2020 focused surveys despite an intensive raking effort, and none were detected as of July 21, 2020 (Althouse and Meade 2022a). A focused survey for bat roosts and species identification was also conducted as part of this study. Pallid bats were observed visually and acoustically during the emergence survey. Silver-haired bats were confirmed present during 2020 nighttime acoustic surveys. No western red bats were detected during 2020 nighttime acoustic surveys. Hoary bats were confirmed present during 2020 nighttime acoustic surveys. Yuma myotis were observed during 2020 nighttime acoustic surveys. As discussed in BIO Impact 8, project activities, including tree removal, have the potential to impact special-status bat species and roosting bats. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-8.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to bats would be less than significant with mitigation (Class II). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Appendix E of the EIR, which provides a detailed description of potential project-related impacts to sensitive habitat and special status species.
CWF/CO-7	The comment states that project impacts to oak forest, plants, and wildlife dependent upon the habitat are also profound, as described in Chapter 4.4, *Biological Resources*, Biological Resources chapter. The comment speaks to the merits of the project but does not raise specific questions about the adequacy of the environmental analysis. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-8	The comment expresses concern related to inconsistency with local plans related to the protection of biological resources and GHG impacts related to the loss of oak trees. The term "potential" is used in the DEIR's policy consistency analysis because ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable nor required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-1342*). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear. Refer also to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

Comment No.	Response
CWF/CO-9	The comment states the DEIR describes the native oak tree impacts as "potentially inconsistent" with the General Plan Conservation and Open Space Element's Biological Resources Goal 1, and states the proposal clearly runs counter to this goal. Please refer to response to comment CWF/CO-8. As discussed in Section 4.4, *Biological Resources*, the project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. Due to this inconsistency, residual impacts associated with BIO Impact 1, BIO Impact 4, BIO Impact 14, BIO Impact 15, BIO Impact 18, and BIO Impact 20 have all been found to be significant and unavoidable (Class I). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-10	The comment raises concern related to the project's consistency with applicable planning documents related to the protection of biological resources. Please refer to response to comment CWF/CO-8. A detailed discussion of the project's inconsistency with Biological Resource policies 3.1, 3.2, 3.3, 1.2, and 2.6 of the General Plan and County Land Use Ordinance (Title 22) Section 22.98.072(H)(1)(e) Landscaping is provided in Table 4.4-6, *Preliminary Policy Consistency Evaluation*. As described in Table 4.4-6, the project was determined to be potentially consistent with LUO Section 22.98.072(H)(1)(e) Landscaping because the project would protect the densest are of oaks on the property and includes replanting with native oaks. In addition, Mitigation Measure BIO/mm-17.2 requires planting pallets to include plants typical of the Nipomo Mesa native oak woodlands, consistent with this policy. Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-11.1, BIO/mm-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1 have been identified to address potentially significant impacts. Due to these potential inconsistencies and the potential lack of feasible mitigation options, residual impacts associated with BIO Impact 1, BIO Impact 4, BIO Impact 14, BIO Impact 15, BIO Impact 18, and BIO Impact 20 have all been found to be significant and unavoidable (Class I). Additionally, alternatives have been identified to reduce potential impacts on biological resources (refer to Master Response MR-3). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-11	The comment refers to CWF/CO's July 2021 letter, which referenced San Luis Obispo County's San Luis Obispo County's Voluntary Oak Management Plan. Section 4.4, *Biological Resources*, also states the proposed project would result in the conversion of oak woodland; therefore, it is subject to mitigation as mandated by SB 1334 and the County oak management plan. The EIR further discloses that, even as mitigated, the project would result in fragmented habitats that would not retain the habitat value currently provided within the undeveloped Specific Plan Area (e.g., refer to the Residual Impacts discussion under BIO Impact 14). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-12	The comment states the proposed "oak destruction" has risen since the Initial Study was released, from greater than one third of the site's oaks to greater than three quarters (76%). It is unclear where the "greater than one third" reference comes from, as the IS/NOP prepared for the project and circulated for public review in June-July 2021 did not quantify the extent of onsite impacts to oak trees or woodland. Regardless, potential impacts associated with the proposed project (including impacts to oaks) are thoroughly evaluated in the Draft EIR and are mitigated accordingly. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-13	The comment raises concern over cumulative loss of oak trees and habitat and biodiversity degradation. As discussed in Chapter 2, *Project Description*, off-site NCSD improvements have not been designed and their precise location is not currently known. For this reason, off-site improvements have been evaluated at a more programmatic level in the EIR. However, all off-site improvements would be located within existing road shoulder areas and/or public rights of way and potential impacts would be negligible. The direct, indirect, on-site, off-site, and cumulative impacts of the proposed project on biological resources are detailed in Section 4.4, *Biological Resources*, to the extent they can currently be evaluated. The comment does not point to any specific inaccuracy or deficiency in the EIR; rather, it largely quotes (like many other portions of the CWF/CO comment letter) the findings of the Draft EIR, presumably in order to highlight the significant adverse environmental effects to biological resources identified in the EIR. Refer to Master Response MR-3.

Comment No.	Response
	No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-14	The comment states that the DEIR does not analyze nor provide mitigation for greenhouse gas impacts of tree removals. Please refer to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-15	The comment states that California requires the analysis and mitigation of greenhouse gas emissions associated with proposed oak woodland or forest conversions. Please refer to Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-16	The comment states that if the project advances, it is necessary to include mitigation for impacts related to GHG emissions from loss of oaks. Please refer to Master Response MR-3. As discussed in Section 4.4, *Biological Resources*, Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-11.1, BIO/mm-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1 have been identified to address potentially significant impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CWF/CO-17	Please refer to Master Response MR-3 and responses to CWF/CO comments above. The comment speaks to the merits of the project but does not raise specific questions about the adequacy of the environmental analysis. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.2 League of Women Voters of San Luis Obispo County

July 27, 2022

Department of Planning and Building
Attn: Jennifer Guetschow
jguetschow@co.slo.ca.us
976 Osos Street Room 300
San Luis Obispo CA 93408

RE: Dana Reserve Specific Plan Draft EIR

The League of Women Voters of San Luis Obispo County (LWV SLOCO) has reviewed the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan and offers the following comments. LWV SLOCO supports measures that, "Pursue planning and land use policies and actions in keeping with long-range General Plans which provide for orderly land use, and which respect environmental and aesthetic considerations." In addition, LWV SLOCO has policies which call for effective enforcement of "measures and procedures designed to attain General Plan goals." The Dana Reserve Specific Plan is not compatible with, nor does it implement the current San Luis Obispo County General Plan priorities for the Canada Ranch (which is part of the Dana Reserve Specific Plan). Please respond to the following comments in the Final EIR.

1. Land Use: The proposed Specific Plan primarily accommodates residential uses which are currently supported only as incidental uses in the General Plan. The Draft EIR identifies this impact as "potentially compatible" because the Dana Reserve Specific Plan will replace the language in the General Plan to be consistent with what is approved. This finding does not address the inconsistency with the current General Plan direction. **LWVSLO-1**

2. Housing: With the median house price in the county coming in at $875,000 as of June 2022, affordability of housing is a major concern. An individual or family that qualifies as Lower Income is earning a maximum of $62,358 and cannot afford the housing proposed. The EIR needs to address the recent revocation of the County's Inclusionary Housing Ordinance and associated fee and how this impacts the requirement to provide or contribute funds for affordable housing. "Affordable by Design" housing (i.e. housing that is smaller than 1,890 sq. ft. median size as of June 2022) does not qualify as affordable housing as it is not deed- or price-restricted and does not qualify under state laws as affordable housing. **LWVSLO-2**

3. Jobs-Housing Imbalance: The existing San Luis Obispo County General Plan direction for the area now being proposed as the Dana Reserve Specific Plan provided priorities for development of the property with the first priority listed as Open Space. Subsequent land uses were listed in priority order of Industrial, Commercial Service, Retail, Highway-oriented Retail; and finally, Residential in the lowest priority. Nipomo is already a bedroom community of primarily housing uses and workers in these dwellings must travel north or south to access head-of-household jobs. This imbalance in jobs versus dwellings creates impacts related to traffic, congestion, and air quality which is why the General Plan policies directed uses that would support job development for existing and future residents. While the draft EIR identifies this impact as significant and unavoidable, it does not offer mitigation. The final EIR should discuss an alternative that lessens **LWVSLO-3**

LWV SLOCO Page 1 of 3

the imbalance even if it isn't possible to reduce impacts to less than significant levels. **LWVSLO-3 (cont'd)**

4. Biological: LWV SLOCO adopted policies support preservation of scenic, natural, and open space resources, including trees, vistas, streams and hills. The removal of over 4,000 mature oak trees and other native and endangered species does not appear to be consistent with either the local League's policies nor those of the County of San Luis Obispo. We will defer to others with more technical knowledge to address the particulars of how this impact should be addressed as part of the final EIR, but in general, the alternatives should explore a smaller development that leaves the oak woodland and associated habitat intact. **LWVSLO-4**

5. Air Quality/GHG/Transportation: The DEIR identifies these impacts as significant and unavoidable. There are inconsistencies with the Sustainable Communities Strategy as well as Greenhouse Gas Emissions policies. While mitigations are offered including requiring Transportation Demand Management plans for the commercial uses (which have had mixed results), the bulk of the impacts will be coming from the large number of residential dwellings proposed. Proposed mitigations (i.e. only electric fireplaces, bike safety, providing shade on parking spaces and park and ride lots, for example) don't seem to address enforceable mitigations as required by CEQA to address the proportion of impacts from the residential uses. This overarching EIR will direct the requirements for future subdivisions and development and should provide more mitigation direction for the subsequent project level environmental reviews. **LWVSLO-5**

6. Public Services: The DEIR identifies Fire Safety as a potential impact due to response time challenges for the proposed level of development in this location. The mitigation offered through the DEIR is to require dedication of land for a future fire station in an appropriate location. The LWV SLOCO supports this mitigation but would ask that directional language for future subdivision and development projects to address timing of fire station development be included in the final EIR. A dedicated vacant lot will not protect future development from emergencies and some threshold of development should be identified that would trigger the need for actual construction and staffing of a fire station to meet emergency response times. **LWVSLO-6**

7. Recreation: The DEIR does not identify the Specific Plan development's demand for regional parks as an impact. While this determination relies on the underlying County methodology of counting open space as park space, the LWV SLOCO would offer that areas that are able to be seen but not accessed should not be included as parks space. Areas such as Bishop Peak, the Elfin Forest, Lopez and Santa Margarita Lakes; El Chorro, and Monarch Grove are included in the listed 11,991 acres of regional parks. However, much of these open spaces are natural areas and are not accessible for recreation. The DEIR lists parks as being in a surplus, however, removing some of these inaccessible areas of natural space from the calculation results in the development being not compliant with current goals for parks space per 1,000 residents. This may not be a policy inconsistency, but development will result in a physical adverse impact to the need for parks. **LWVSLO-7**

8. Aesthetics: The DEIR finds many of the aesthetic impact to be "potentially inconsistent" with policy direction. The County's South County Inland Area Plan, Conservation and Open Space Element, and Framework for Planning policies all contain language that would require maintaining the rural nature of the area; minimizing landscape removal and grading; retaining land in open space to preserve oak woodlands; and biological qualities of the county's open spaces. Although **LWVSLO-8**

the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surrounding landscape through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oaks; and substantial habitat loss and landform alteration. The LWV SLOCO proposes that these impacts are inconsistent, not potentially inconsistent. While replacement landscaping is proposed, this landscaping is placed in narrow strips and does not include grading to improve replacement landscaping's visual buffering. Wider strips with elevating berms should be discussed. The current proposal is more urban in appearance, would take decades to provide meaningful screening and restoration of the character of the site, and would not be able to replace the fauna displaced by the removal of the oak tree habitat.

LWVSLO-8 (cont'd)

9. Alternatives discussion: The LWV SLOCO requests that additional discussion of alternatives be offered in the final EIR. The DEIR reviews several alternatives but appears to conclude that any reduction in the number of housing units proposed would prevent the development from including an affordable mix of housing. The discussion sets up a false dichotomy and is inadequate. There does not appear to be documentation of whether there is a threshold of residential units required to meet the project objectives or project feasibility.

LWVSLO-9

For the above reasons, the LWV SLOCO recommends that the County of San Luis Obispo reconsider the type, scale, and location of development proposed in the Dana Reserve Specific Plan unless modifications to the project are required to respond to the many impacts identified in the DEIR. LWV SLOCO recognizes the need for housing and supports development of housing in appropriate locations. However, the DEIR for the Dana Reserve Specific Plan appears to indicate that the current location is not appropriate for the level of development proposed.

LWVSLO-10

Thank you,

Cindy-Marie Absey
President, League of Women Voters of San Luis Obispo County

Neil Havlik
Co-Chair, Natural Resources Committee
League of Women Voters of San Luis Obispo County

Kim Murry
Co-Chair, Natural Resources Committee
League of Women Voters of San Luis Obispo County

9.3.2.1 Response to Letter from League of Women Voters of San Luis Obispo County

Comment No.	Response
LWVSLO-1	The comment states that the proposed Specific Plan primarily accommodates residential uses which are currently supported only as incidental uses in the General Plan and that the Draft EIR identifies this impact as potentially compatible because the Dana Reserve Specific Plan will replace the language in the General Plan to be consistent with what is approved. The comment suggests this finding does not address the inconsistency with the current General Plan direction. The project includes a proposed General Plan Amendment, which inherently indicates it is requesting some revision to General Plan policy to accommodate a different use at the project site. The proposed General Plan Amendment is described under Section 2.5.4, *General Plan Amendment*, in Chapter 2, *Project Description*, of the EIR and analyzed throughout the document. In addition, Alternative 2 and Alternative 3 describe development scenarios that would be consistent with the current General Plan; these alternatives are analyzed in Sections 5.4.3 and 5.4.4 of the EIR and provide a comparison of the potential environmental impacts associated with the proposed General Plan Amendment. As indicated in Table 5-3, both Alternative 2 and 3 would result in decreased environmental impacts; however, neither would meet most of the project objectives, primarily providing a mix of residential uses, including affordable and market rate workforce housing. No changes to the EIR are necessary in response to this comment.
LWVSLO-2	The comment suggests the EIR needs to address the recent revocation of the County's Inclusionary Housing Ordinance and associated fee and how this impacts the requirement to provide or contribute funds for affordable housing. The comment states "Affordable by Design" housing (i.e., housing that is smaller than 1,890 sq. ft. median size as of June 2022) does not qualify as affordable housing as it is not deed- or price-restricted and does not qualify under state laws as affordable housing. Relevant sections of the EIR have been revised to clarify the County's previous Inclusionary Housing Ordinance has been repealed. The remainder of the comment does not address a specific environmental issue. No changes to the EIR are necessary in response to this comment. However, it should be noted that the EIR does not consider "affordable by design" housing as comparable to deed-restricted "affordable housing" that would qualify under state laws as affordable housing based on established household income ranges. The proposed affordable by design housing within the Dana Reserve Specific Plan Area would be market rate (not deed restricted) and is intended to meet the needs of workforce housing (or what's sometimes referred to as the "missing middle" housing need).
LWVSLO-3	The comment states that the imbalance in jobs versus dwellings creates impacts related to traffic, congestion, and air quality and suggests that the EIR discuss an alternative that lessens the imbalance. As discussed in Section 4.14, *Population and Housing*, the project would provide additional housing in the community of Nipomo, contributing to the unbalanced jobs-to-housing ratio, which has the potential to result in a range of adverse environmental impacts, including increased vehicle miles traveled (VMT); increased energy consumption, GHG emissions, and air pollutant emissions from additional commuters; and indirect impacts on other communities that build housing, such as loss of habitat. Buildout of the Dana Reserve Specific Plan (DRSP) would result in substantial unplanned population growth in the unincorporated community of Nipomo and adversely affect the local jobs-to-housing ratio within the Inland South County Planning Area. However, the project would also result in the construction of additional housing units that would help the County reach its housing development allocation goals per the County RHNA required by state law. Based on an evaluation of the project objectives, no feasible mitigation has been identified that would reduce this significant impact. Therefore, potential impacts associated with substantial unplanned population growth would be significant and unavoidable. Note: please refer to Chapter 10, which describes project changes since circulation of the Draft EIR that would reduce this impacts). As discussed in Chapter 5, *Alternatives Analysis*, Alternatives 2 and 3 would result in reduced population and housing impacts compared to the proposed project. Alternative 2 would substantially reduce the number of proposed residential units and would increase the amount of commercial and light industrial land uses at the project site. This alternative would be consistent with the growth envisioned in the General Plan for the Inland South County Planning Area. This buildout scenario would also aid the County in balancing the jobs-to-housing ratio within the region. However, since residential development would be more limited, Alternative 2 would be less effective in helping the County reach its housing development allocation goals per the County RHNA required by state law and other General Plan policy. In addition, due to the reduced number of proposed residential units, this alternative may be infeasible due to the need for expensive water, wastewater, and transportation infrastructure extensions/expansions to serve the project site. Because this alternative would generate less population growth than the proposed project and would be consistent with the General Plan, impacts related to population and housing would be decreased compared to the proposed project, as well as related impacts to associated issue areas (e.g., Air Quality, Greenhouse Gas Emissions, Transportation; refer to Table 5-3). Since no commercial development would occur under Alternative 3, this alternative would not generate new employment opportunities and, therefore, would not reduce impacts associated with jobs-to-housing balance.

Comment No.	Response
	However, because this alternative would reduce the number of new residents within the community and be consistent with the General Plan land use designation and planned growth projections for the site, Alternative 3 would not result in unplanned population growth. However, since residential development would be limited, this alternative would not help the County reach its housing development allocation goals per the County RHNA required by state law to the same extent as the proposed project. In addition, this alternative would result in minimal, if any, affordable housing units, which is inconsistent with the basic project objectives. Alternative 3 would generate substantially less population growth than the proposed project, and impacts related to population and housing would be decreased compared to the proposed project. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LWVSLO-4	The comment states the removal of over 4,000 mature oak trees and other native and endangered species does not appear to be consistent with either the local League's policies nor those of the County of San Luis Obispo and suggests the alternatives should explore a smaller development that leaves the oak woodland and associated habitat intact. Refer to Master Response MR-3. A range of project alternatives was evaluated in Chapter 5, *Alternatives Analysis,* to address the project's significant and unavoidable impacts. Alternatives 1, 2, 4, and 5 all include modified site plans which would include reduced development footprints and increased open space areas compared to the proposed project. The No Project Alternative and Alternatives 2, 3, and 4 would all result in reduced impacts to biological resources compared to the proposed project. Alternative 1 would retain approximately 4 acres of additional oak woodland habitat in the northeastern portion of the site, ultimately reducing the number of impacted oak trees. Under Alternative 2, approximately 137 acres of land would be retained for open space, reducing the number of impacted oak trees and the amount of other impacted native habitat (i.e., Burton Mesa chaparral) at the project site. Based on the significantly reduced development footprint, if properly situated, Alternative 2 could largely avoid direct removal and impacts to oak woodland and Burton Mesa chaparral. Buildout of the site under Alternative 3 would be reduced due to the lower density of clustered residential development, which would ultimately reduce the amount of impacted oak woodland and Burton Mesa chaparral habitat at the project site. Under Alternative 4, buildout would be predominantly limited to areas of non-native grassland and the potential to disturb special-status plant and wildlife species would be substantially reduced compared to the proposed project; however, minimized impacts to special-status plant and wildlife species and natural communities, including oak woodland and Burton Mesa chaparral, would continue to occur. Under Alternative 5, the density of residential units along the perimeter of the project site would be reduced, which would result in slightly less impacts to individual oak trees and oak woodland habitat that occur in those areas. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.
LWVSLO-5	The comment raises concern related to consistency with applicable planning documents, including the Sustainable Communities Strategy and GHG policies, and asserts that the EIR should provide more mitigation direction for the subsequent project level environmental reviews. The DRSP has been developed with input from various governmental agencies and has employed strategic growth and transit-oriented development principles for site planning and infrastructure. All available feasible mitigation measures have been identified for construction-generated mobile-source and evaporative emissions, construction-generated fugitive dust, long-term operational emissions, long-term exposure to localized pollutant concentrations, and naturally occurring asbestos, consistent with the CEQA requirement that lead agencies mitigate environmental impacts to the greatest extent feasible. The DRSP EIR is intended to expedite the processing of future projects that are consistent with the DRSP and consistent with the analysis and findings of this EIR. Therefore, though the specific details of future developments within the DRSP are not currently known, this EIR evaluates a reasonable maximum development scenario that would be allowed by the Specific Plan, as illustrated in the Conceptual Master Development Plan. Each subsequent subdivision/development within the Specific Plan Area would be required to implement the mitigation requirements described in the EIR, which as stated above, include all known feasible mitigation to reduce impacts related to Air Quality, GHG emissions, and Transportation. If, when considering subsequent development proposals, the County determines that a proposed development would be consistent with the uses described herein and would not result in new or more severe significant environmental effects or require additional mitigation, the County can approve the project without additional environmental review (California Government Code Section 65457 and State CEQA Guidelines Section 15182). However, if there are significant changes proposed that are not consistent with the approved DRSP or the type and level of development analyzed in this EIR that the County concludes may result in new significant environmental impacts, additional environmental review would be required consistent with the requirements of State CEQA Guidelines Section 15162. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

Comment No.	Response
LWVSLO-6	The comment expresses support for the dedication of land for a future fire station but requests that the language of the mitigation measure be revised to address timing for the development of the fire station. The precise timing of development of proposed residential and commercial uses within the Specific Plan Area is unknown and would depend on market factors and the goals of individual developers. However, based on a market analysis prepared by the project applicant and project goals, and for purposes of this EIR analysis, it is conservatively anticipated that the project would be built out over approximately 7 years. As discussed in Section 4.15, *Public Services*, the Specific Plan Area would be provided fire protection services by CAL FIRE Station 20. Based on the nature and scale of proposed development and associated population growth within a high FHSZ, the project would contribute to the increasing demand for fire protection services and the need for a new fire station in Nipomo. In order to offset the project's incremental demand on the existing need for fire protection services in the community, Mitigation Measure PS/mm-1.1 has been included to require the project to set aside land to provide a location for future development of a new CAL FIRE station. In addition, the project would be subject to payment of the County's Public Facilities Fees, which would provide funding for maintenance of existing and future facilities. Since exact timing of buildout is currently not known and dependent on market factors, the timing of buildout of the new fire station would be determined through coordination with the County of San Luis Obispo and California Department of Forestry and Fire Protection. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LWVSLO-7	The comment states the Draft EIR does not identify the Specific Plan development's demand for regional parks as an impact and suggests removing inaccessible areas of natural space from the parkland calculations included in the DEIR. Please refer to responses to comments SLOPRD-1 through SLOPRD-54 in Section 9.2.9, above. The County of San Luis Obispo Parks and Recreation Department has clarified in their comments on the DEIR that they have ample parkland and recreational land in the Nipomo area, including the 136-acre Nipomo Community Park, of which only 35 acres are developed with recreational amenities. What they lack is the funding to develop that land with additional recreational facilities. Therefore, the project has been revised to propose dedication of a privately maintained (but open to the public) park within the Specific Plan Area in conjunction with full payment of Quimby fees (refer to Chapter 10), consistent with the recommendation of the County Parks Department. As discussed in Section 4.16, *Recreation*, impacts related to increased use of existing neighborhood, community, and regional parks and other recreational facilities are evaluated in REC Impact 1. The assessment of park acreage and the threshold methodology are consistent with the County's General Plan and 2016-2018 Resource Summary Report. Following full buildout and the associated population increase, the County would provide approximately 41.5 acres of regional parkland per 1,000 residents in the county and approximately 5.6 acres of community parkland per 1,000 residents in the community of Nipomo. Since the County would continue to exceed established service goals for both regional and community parkland, there would be adequate parkland to provide recreation opportunities to new and existing residents. Based on the amount of available parkland, implementation of the project and associated population increase would not result in substantial deterioration of existing public recreation facilities. In addition to proposed residential, commercial, and light industrial uses, the DRSP includes the proposed development of on-site recreational facilities, including pedestrian, bicycle, and equestrian trails; 8.5 to 12 acres of pocket parks within proposed neighborhoods; an 11-acre public park; and 49.8 acres of open space areas. Construction of an additional public park within the community of Nipomo would increase the community park acreage to 147. Therefore, based on the total buildout population estimate of 24,326 residents in 2030 in the community of Nipomo, there would be approximately 6 acres of parkland per every 1,000 residents, which would exceed the goal of 2 to 3 acres of community parkland per 1,000 residents. Construction of the proposed on-site recreational facilities would reduce the demand on existing recreational facilities within the county and the community by providing new local recreational facilities within the Specific Plan Area. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP.

Comment No.	Response
LWVSLO-8	The comment raises concern related to the identification of a number of “potentially” inconsistencies with applicable policies related to visual resources and the change in the visual character the site and surrounding area and adequacy of the proposed mitigation. The term "potentially inconsistent" is used in the DEIR's policy consistency analysis because ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project’s consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable or required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341*-1342). The decision makers are required to evaluate the project’s consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear. As discussed in Section 4.1, *Aesthetics*, as a result of the loss of so many mature oak trees, extensive grading, and lack of visual screening, implementation of the DRSP would substantially degrade the existing visual character and quality of the project site and its surroundings. Mitigation has been included which would require a U.S. Route 101 Visual Screening Zone along the length of the project adjacent to the utility easement and U.S. Route 101 for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. The U.S. Route 101 Visual Screening Zone shall be a minimum width of 20 feet. The screening zone shall be in addition to the minimum 20-foot width of the utility easement. Existing trees in this zone shall be preserved. Additionally, replacement trees shall be planted within the “on-site” project boundaries in areas that maximize their visibility from public roadways and common areas. Replacement trees shall be planted from the following container sizes: 45% of the replacement trees shall be a minimum of 15-gallon container size, 45% of the replacement trees shall be a minimum of 24-inch box container size, and 10% of the replacement trees shall be a minimum of 48-inch container size. All replacement trees shall be maintained in perpetuity. Landscape Architect, Robert Carr, ASLA, prepared the impact analysis included in the Aesthetics section of the DEIR and determined Mitigation Measures AES/mm-3.1 and AES/mm-3.2 would be sufficient to reduce potential impacts to the visual character of the site and its surroundings to a less-than-significant level. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LWVSLO-9	The comment requests that additional discussion of alternatives be offered in the final EIR. In accordance with the CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the proposed project. As described in Chapter 2, *Project Description*, one of the objectives of the project is to provide the primary project objectives identified for the DRSP include a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the *County of San Luis Obispo General Plan*, the County of San Luis Obispo (County) Inclusionary Housing Ordinance, and regional housing needs.
LWVSLO-10	The comment recommends the County reconsider the type, scale, and location of development being proposed unless modifications to the project are required to respond to the many impacts identified in the DEIR. Mitigation has been included throughout the DEIR to address identified impacts. Additionally, a range of alternatives has been identified and evaluated in an effort to reduce significant and unavoidable impacts. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.3 Nipomo Recreation Association

Jennifer Guetschow

From: Nipomo Recreation <nipomorecreation@gmail.com>
Sent: Friday, July 29, 2022 12:32 PM
To: Jennifer Guetschow
Subject: [EXT]Re: Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer,

The Mission of the Nipomo Recreation Association is to enhance the quality of life for all residents of the Greater Nipomo are by providing diverse and quality recreation programs, services, athletic opportunities, and facilities in direct response to the needs of Nipomo.

Nipomo Recreation has many programs that benefit the Nipomo community. We offer Special Events throughout the year, Youth Basketball League, before and after school care, we own and operate three Little Bits Preschool & Toddler Centers, and we team up with LMUSD with the Bright Futures program, and much, much more. We provide service for families of children ages 6 weeks through 8th grade.

Our organization played a key role during the pandemic in meeting the needs of the most vulnerable families in our community. We support the Dana Reserve project for several reasons. The main reason is the land donation for a daycare center. This is a very real need in Nipomo. Families in our community have limited options for childcare. Our three preschools hear from families daily about the struggle for childcare and the impacts to their life at home and work.

The Dana Reserve will add to the childcare capacity for the community. While we recognize that the EIR considers the environmental impacts to the community we hope this will be weighed against the human impacts and benefits to the community.

NRA-1

Sincerely,

--

Jeff Long
Nipomo Recreation Association
CEO/Executive Director
nipomorecreation@gmail.com
c: 805-215-9295

1

9.3.3.1 Response to Letter from Nipomo Recreation Association

Comment No.	Response
NRA-1	The comment indicates support for the project and states that the Dana Reserve will add to the needed childcare capacity for the community and that this "human" impact and benefit should be weighed against the environmental impacts to the community. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.4 Sierra Club Santa Lucia Chapter

SIERRA CLUB
SANTA LUCIA

July 29, 2022

Sierra Club comment on the Draft Environmental Impact Report for the Dana Reserve Specific Plan

The Santa Lucia Chapter of the Sierra Club represents the 3,000 members and supporters of the Sierra Club, the nation's oldest and largest grassroots environmental group, residing in San Luis Obispo County. We find the Dana Reserve Specific Plan's Draft Environmental Impact Report to be inadequate on multiple fronts:

Loss of carbon sequestration via mature oaks must be part of the EIR's Greenhouse Gas emissions evaluation

This project proposes to clear 75 acres of coast live oak woodland and oak forest on the ranch—about 4,000 individual trees, covering 40 percent of the project area -- and plant "anywhere from 1,500 to 3,000 oak trees" as mitigation.

While it has always been obvious that the replacement of mature trees with saplings is a gesture toward mitigation as opposed to actual mitigation, it has become even less appropriate as the most urgent environmental issue of our time has taken shape over the last 30 years. With carbon emissions and climate change as the issue that all proposed developments must address, the full mitigation of such impacts must be a priority. This project proposes to remove @ 4,000 of the most efficient carbon absorbing trees -- six mature oaks can sequester 1 ton of CO2 per year -- replacing them with saplings that have nowhere near the CO2 absorption rate of mature oaks and which will take decades to achieve it. **SCSLC-1**

Timothy J. Fahey, professor of ecology in the department of natural resources at Cornell University, states that "An approximate value for a 50-year-old oak forest would be 30,000 pounds of carbon dioxide sequestered per acre. The forest would be emitting about 22,000 pounds of oxygen."

Further: "Forests need to have a permanence of 100 years to be effective carbon stores. So you plant your saplings and then you have to maintain the forest for 100 years."

Better to retain the existing woodlands. Per the California Oak Foundation, "if we assume that our current oak woodlands and forests average 100 years of age, then we can expect to sequester almost three million tons of additional carbon a year by protecting and conserving these trees throughout the 21st century." **SCSLC-2**

The annual precipitation rate is overstated and unlikely to occur in the future SCSLC-3

The DEIR does not consider the project to present a significant and unavoidable impact on water supply. The reader is assured that the Nipomo CSD has sufficient water supply to serve the project, and by 2025 the CSD will be "contractually required to increase the purchase of water from Santa Maria by an additional 700 acre-feet."

Contrary to the evident belief of the authors of the DEIR, water is not a "voluntary groundwater reduction goal," or a "Wholesale Water Supply Agreement," or "minimum required water delivery," or "the license agreement between the County of Santa Barbara and the NCSD," or "the NSWP's designed capacity," or "pump replacements and additional system pipelines," all of which the DEIR offers as proofs that the water to support the proposed development will be available. SCSLC-4

In its discussion of actual water, the DEIR notes that one of the two sources of water for the proposed project is the Santa Maria River Valley Groundwater Basin. The DEIR states:

"Groundwater recharge of the basin occurs from rainfall percolation, riverbed recharge, subsurface inflows, and return flows. The average annual precipitation within the basin is 15.65 inches, based on data collected between 1958 and 2020 (MKN 2021)." In the Project Setting, the DEIR estimates annual rainfall as between 15 and 20 inches per year.

Per the NOWData program of the National Weather Service, mean precipitation in the region since 2000 has been 11.67 inches. Recent annual precipitation in the area has been as follows:

2018	8.63
2019	17.10
2020	8.28
2021	11.20

SCSLC-5

NWS precipitation levels for the first five months of 2022 are:

Jan.: 0.17

Feb.: 0.07

Mar.: 1.07

Apr.: 0.39

May: 0.00

In 22 years of measurements, the NWS recorded 1 year when precipitation for the project area met or exceeded 20 inches of rain, which was solely due to a record-breaking month in December 2010. Of the records lows set for minimum monthly precipitation over the last 22 years, 9 of the 12 record minimums (0.00) were set in the last 4 years.

This corresponds with California Drought Action's finding that "2022 had the driest January, February, and March in over 100 years" (https://drought.ca.gov). Per the State of California, the last 3 years have produced "a historic level of dryness…and it's only getting worse." **SCSLC-5 (cont'd)**

This data should be weighed against the DEIR's statement that average annual precipitation for the area -- if the average is calculated using data stretching back six decades -- is 15.65 inches. For current precipitation levels, see the National Weather Service data above. **SCSLC-6**

In noting that the region is currently in a Stage 4 drought condition, the DEIR appears to rely on the belief that the "voluntary reduction measures" triggered by Stage 4 and Stage 5 designations will assure available water in any drought condition of any duration. We note that the Governor has asked that Californians cut their water use by 15% from 2020 levels, but this has produced no more than a 3.7% reduction. **SCSLC-7**

The Draft EIR omits to mention or analyze the impact of aridification. The Final EIR should include current data on this phenomenon and analyze how the effect of increasingly arid conditions in California that are drying out soils may affect groundwater recharge and otherwise impact previous projections of the region's future water supply. **SCSLC-8**

Significant air quality impacts are not "potentially consistent" with existing policies

In Table 4.3-7 "Project Consistency with the SLOAPCD's CAP Transportation and Land Use Control Measures," much reliance is placed on AQ/mm-3.3, repeatedly cited as a mitigation measure that will achieve potential consistency with policy goals on the avoidance of air pollution increases and toxic exposure, strategic growth, reduction of greenhouse gas emissions, transportation control measures, etc. However, the DEIR states at 4.2-25: "With incorporation of Mitigation Measure AQ/mm-3.3…to reduce operational air emissions, operational emissions of fugitive dust would exceed daily SLOAPCD thresholds; however, emissions would not exceed quarterly thresholds."

We note that residents and wildlife in the area breathe on a daily, not quarterly, basis, and therefore quarterly non-exceedance cannot be said to render the project's air quality impacts "potentially consistent" with policies designed to protect residents from the impacts of breathing unhealthful air. No impacts that result in the conclusion that "the generation of criteria pollutants in exceedance of established daily emissions thresholds would be significant and unavoidable" can be said to be "potentially consistent" with existing policies. **SCSLC-9**

Proposed mitigations for significant impacts to biological resources won't work

The coast live oak woodland on the project site "provides important native habitat for plants and wildlife" and "contributes significantly to…the region's overall biological diversity." But virtually all the proposed mitigations of significant impacts to sensitive biological resources share one feature in common: They are more than likely to fail, as noted repeatedly at 5.2.2.: **SCSLC-10**

> "…feasible mitigation may not be possible for all species…."

> "…there is a lack of information about the cultural requirements to successfully propagate California spineflower at a large scale and Sand almond propagation is very difficult…."
>
> "…due to the limited range of [Burton Mesa chaparral] and the limited availability of off-site mitigation parcels, implementation of this mitigation may not be feasible…."
>
> "…mitigation for coast live oak woodlands should occur adjacent to the conservation/restoration of Burton Mesa chaparral on sites with sandy soil conditions suitable to support the special-status plant species that occur in the project area. This would effectively maintain and/or recreate the habitat matrix that supports the unique assemblage of species that would be lost as a result of the proposed project. However, implementation of this mitigation may not be feasible."

SCSLC-10 (cont'd)

We note the manner in which these impacts differ from the usual category of Class I "significant and unavoidable" impacts encountered in an EIR -- i.e. impacts are considered Class I because the mitigation measure will partially reduce the impacts but not below a level of significance ("Mitigation has been included to reduce VMT and associated emissions; however, VMT would still exceed established thresholds"). The Class I impacts to biological resources this project will inflict are significant not because mitigations will be unable to reduce impacts below an established threshold of significance, but because there will be no mitigation at all. The loss of impacted biological resources will be total. Terms such as "very difficult" and "may not be possible" – all impermissibly vague per the requirements of the CEQA Guidelines -- mask the fact that, at this point, the EIR is going through the motions, describing mitigations that cannot be attempted or will not work but which fulfill the obligation of proposing mitigations rather than admitting that there will be no mitigation measures for the impacts described.

No overriding consideration can outweigh the project's unmitigable significant impacts

In noting that the County of San Luis Obispo's approval of this project will require the adoption of a Statement of Overriding Considerations due to its significant impacts, the DEIR suggests that "the County may determine the long-term benefits of the project, such as fostering additional regional housing opportunities, including affordable housing, [provide] substantial overriding considerations for approving the project despite the identified adverse environmental impacts that would result from implementation of the project."

SCSLC-11

Before the County determines that a legally defensible Statement of Overriding Considerations can be based on the project's affordable housing component, it would do well to note the project's "cumulative impacts associated with substantial unplanned population growth," which "would be significant and unavoidable" (5.2.2.5 - Population and Housing). Specifically, "The project would induce substantial unplanned population growth in the Nipomo area, resulting in a significant impact. Buildout of the DRSP would result in substantial population growth within the Inland South County Planning Area that is not specifically projected or planned for in local or regional County planning documents and would result in the exceedance of projected population growth for the unincorporated community of Nipomo."

In other words, the project would provide an affordable housing component while significantly impacting population and housing and "increasing the jobs/housing gap." **SCSLC-11 (cont'd)**

It would be affordable housing provided by a project that relies on a future rate of annual precipitation that is extremely unlikely, while putting pressure on a water supply in a region that is already in Stage 4 drought conditions. It would be affordable housing provided by a project that will mean "maximum daily operational air pollutant emissions [that] exceed SLOAPCD's operational significance thresholds" (and deteriorating air quality is not a selling point for potential home buyers). It would be affordable housing provided by a project that will result in "a cumulatively considerable impact to greenhouse gas emissions," not even including the current and future sequestered carbon lost in the destruction of 4,000 mature oak trees. It would be affordable housing provided by a project that will run counter to the "goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character."

The DEIR also notes that the project's "air emissions and water usage…could indirectly impact agricultural operations near the project site and within the region" and that "it is reasonable to assume that development of the project site with residential and commercial uses could increase the development pressure on agricultural lands nearby the project site," resulting in "conversion of farmland to non-agricultural use," accelerating the loss of farmland. Hence, the County's approval of a Statement of Overriding Considerations would risk sacrificing South County's agriculture for a promise of affordable housing while assuring that a "deterioration in a jobs-to-housing imbalance would be anticipated to hinder regional and local improvements related to increased transportation mobility and potential increase in VMT." **SCSLC-12**

In short, the inclusion of a percentage of affordable housing will not override this project's impacts to the environment and the economy of the region and the County. The Dana Reserve Specific Plan illustrates the reason why affordable housing should be an outcome of public policy, not left to the largesse of developers, inserted into a project proposal like a carrot on a stick for the sole purpose of persuading elected officials to ignore their project's highly destructive environmental impacts.

Select the Burton Mesa chaparral avoidance alternative

The DEIR's alternatives analysis states that "While the Burton Mesa chaparral avoidance alternative would substantially avoid and reduce impacts to biological resources; reduce air pollutant and GHG emissions, VMT, and unplanned population growth; and improve project consistency with applicable plans and policies, this alternative would not reduce significant impacts related to aesthetic resources." **SCSLC-13**

Aside from the attempt to claim that an aesthetic impact outweighs the avoidance of multiple significant impacts to the environment, the DEIR equates "aesthetic impact" with density and multi-family residential units.

The DEIR argues that this alternative does not "meet the basic project objective of providing a range of housing types, including affordable housing." It's clear that this alternative does provide a range of housing types, merely in a different ratio ("Single-family units would be reduced from 831 to 111 and multi-family units would be increased from 458 units to 704 units…resulting in a higher density of commercial and residential development along U.S. Route (US) 101." **SCSLC-14**

We cite the Urban Land Institute's report "Higher Density Development: Myth and Fact:"

"Most public leaders want to create vibrant, economically strong communities where citizens can enjoy a high quality of life in a fiscally and environmentally responsible manner, but many are not sure how to achieve it…. Arguably, no tool is more important than increasing the density of existing and new communities, which includes support for infill development, the rehabilitation and reuse of existing structures, and denser new development." **SCSLC-15**

The argument that this alternative would not provide affordable housing is contradicted by the statement in the alternative analysis that "This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs)." And while the developer may not feel inclined to retain its promised percentage of this alternative's 704 multi-family units and/or 111 single-family units as affordable housing, the County is able to require that designation. **SCSLC-16**

As this alternative is the only one that would substantially avoid or reduce impacts to biological resources while reducing air pollutants, GHG emissions, VMT, and unplanned population growth while rendering the project consistent with applicable plans and policies, and as the DEIR's arguments against housing density and its attempts to allege the loss of affordable housing are without merit, we urge the County to require Burton Mesa chaparral avoidance alternative. **SCSLC-17**

Thank you for this opportunity to comment,

Andrew Christie, Director
Sierra Club – Santa Lucia Chapter
P.O. Box 15755
San Luis Obispo, CA 93406

9.3.4.1 Response to Letter from Sierra Club Santa Lucia Chapter

Comment No.	Response
SCSLC-1	The comment requests that the loss of mature oaks and associated carbon sequestration be discussed in Section 4.7, *Greenhouse Gas Emissions*. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.
SCSLC-2	The comment asserts that it would be better to retain the existing woodlands. The impacts associated with the removal of oak trees have been thoroughly evaluated in Section 4.4, *Biological Resources*, and in Chapter 5, *Alternatives Analysis*. No changes to the environmental document are necessary in response to this comment. Please see Master Response MR-3 related to Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts, including the response specifically related to carbon sequestration.
SCSLC-3	The comment states the annual precipitation rate is overstated and unlikely to occur in the future. The UWMP uses the average annual rainfall rate of 15.65 inches to evaluate the NCSD's water supply, which was summarized in the EIR. While precipitation varies over time, those changes are accounted for in the single-dry and multiple-dry year conditions that were evaluated in the UWMP. The EIR conservatively includes Mitigation Measure USS/mm-3.1 to address future development proposals that may be brought forward during an abnormally low rainfall year in the future in order to ensure there is adequate water supply to serve the existing NCSD service area and the proposed development. No changes to the environmental document are necessary in response to this comment.
SCSLC-4	The comment raises concern over the availability of water supply for the proposed project in addition to the existing community. The NCSD recently adopted its 2020 Urban Water Management Plan (UWMP), which characterizes the District's existing and future water supply during normal, single-dry, and multiple-dry year conditions. The UWMP concludes that the NCSD has more than enough available water supply for the existing and future NCSD service area during normal, single-dry, and multiple-dry year conditions. Additionally, a Water Supply Assessment (WSA) per the requirements of Senate Bill (SB) 610 was prepared for the proposed project, which concluded (consistent with the 2020 UWMP) that the NCSD would have adequate available water supply to supply water for the proposed project at full-buildout during normal, single-dry, and multiple-dry year conditions. Inevitably, there is a certain level of uncertainty regarding the availability of future water supplies, particularly given recent drought conditions, climate change, and the years-long anticipated build-out schedule of the project. Therefore, even though the analysis in the EIR consistently shows adequate water supply to serve the project, the EIR conservatively included Mitigation Measure USS/mm-3.1, which requires that prior to the issuance of development permits for any future project development phase, the project developer is required to provide proof of water supply sufficient to meet the estimated water demand for proposed development. The results of the UWMP and WSA were summarized in detail in Section 19, *Utilities and Service Systems* of the EIR. No changes to the environmental document are necessary in response to this comment. Refer also to Master Response MR-1, Groundwater Management and Impacts.
SCSLC-5	The comment raises concern regarding precipitation measurements used to guide the analysis of the EIR. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.
SCSLC-6	The comment raises concern regarding precipitation measurements used to guide the analysis of the EIR. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.
SCSLC-7	The comment raises concern regarding the availability of water supply for the project and the evaluation of potential drought conditions. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply and Mitigation Measure USS/mm-3.1. No changes to the environmental document are necessary in response to this comment.
SCSLC-8	The comment states that the Draft EIR omits to mention or analyze the impact of aridification. Refer to Master Response MR-1, Groundwater Management and Impacts, and response to comments SCSLC-3 and SCSLC-4 for discussion related to precipitation and water supply. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
SCSLC-9	The comment raises concern related to air quality emissions. As stated in Section 4.3, *Air Quality*, the project would be potentially consistent with policies intended to reduce emissions of criteria air pollutants, PM, and TACs to meet federal and state standards with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1. AQ Impact 1 identifies a significant and unavoidable impact because the proposed project would be inconsistent with elements of the SLOAPCD's 2001 Clean Air Plan. No changes to the environmental document are necessary in response to this comment.
SCSLC-10	The comment raises concern related to the feasibility of mitigation included in the EIR to reduce impacts to biological resources. As discussed in Section 4.4, *Biological Resources,* mitigation has been identified for impacts to special-status plant and wildlife species, Pismo clarkia, mesa horkelia, Nipomo Mesa ceanothus, sand mesa, California Rare Plant Rank 4 and Watch List plant species, monarch butterflies, California legless lizards, Blainville's horned lizards, special-status birds, raptors, nesting birds, special-status and roosting bats, American badger, California red-legged frog, western pond turtle, two-striped garter snake, Burton Mesa chaparral, coast live oak woodland, riparian and aquatic habitat. A variety of mitigation measures has been identified to address impacts, including environmental monitoring; a worker environmental training program; covering excavations; erosion control; a public education program; prohibition of invasive plants; an incidental take permit; avoidance; preservation/restoration mitigation for rare plants; preconstruction surveys; special-status reptiles protection and relocation; nesting bird preconstruction surveys and nest avoidance; bat preconstruction surveys and passive relocation; badger den preconstruction survey and relocation; California red-legged frog, western pond turtle, and two-striped garter snake surveys and relocation; Conservation/enhancement/restoration for Burton Mesa chaparral; off-site mitigation for coast live oak woodland; delineation setbacks, timing constrains, and monitoring for riparian areas and aquatic habitats; an on-site tree protection plan for trees retained; a tree replacement plan; protection for on-site oak woodland resources; off-site preservation for oak woodlands; and oak tree monitoring. Impacts for which mitigation may not be feasible or sufficient to reduce the severity to be less than significant have been classified as significant and unavoidable (Class I). Constraints that would yield identified mitigation as impractical or infeasible are clearly defined in Section 4.4, *Biological Resources*. Pursuant to CEQA Guidelines Sections 15042 and 15043, the leady agency's decision-making body will review the CEQA document prepared for the proposed project and may reject the project if necessary in order to avoid one or more significant effects on the environment, or approve the project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant impact and identified benefits from the project outweigh the policy of avoiding significant environmental impacts of the project. No changes to the environmental document are necessary in response to this comment. Refer also to Master Response MR-3, Oak Tree, Oak Woodland, and Burton Mesa Chaparral Impacts.
SCSLC-11	The comment states that no overriding consideration can outweigh the project's unmitigable significant impacts. Pursuant to CEQA Guidelines Sections 15042 and 15043, the leady agency's decision-making body will review the CEQA document prepared for the proposed project and may reject the project if necessary in order to avoid one or more significant effects on the environment, or approve the project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant impact and identified benefits from the project outweigh the policy of avoiding significant environmental impacts of the project. The existing planned level of growth in the Nipomo region and countywide, is indicative of historic growth trends that have contributed to the existing "housing crisis." Growth and housing development in excess of historic trends is necessary to fix the extreme housing shortage in the state. No changes to the environmental document are necessary in response to this comment.
SCSLC-12	The comment states the inclusion of a percentage of affordable housing will not override this project's impacts to the environment and the economy of the region and the County. Please refer to response to comment SCSLC-11. The comment points to the identified significant impacts of the project, all of which are clearly stated in the EIR. No changes to the environmental document are necessary in response to this comment.
SCSLC-13	The comment states that the Burton Mesa chaparral avoidance alternative should be selected as the preferred alternative. State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts. As discussed in Chapter 5, *Alternatives*, the Burton Mesa Avoidance alternative does not meet the basic project objective of providing a range of housing types, including affordable housing, workforce housing, and affordable by design housing. Further, the reduced number of units and utility connections makes expansion of NCSD

Comment No.	Response
	infrastructure to serve the site more expensive per unit, increasing the challenges of providing affordable housing within the Specific Plan Area. Since this alternative does not meet the basic project objectives, is likely infeasible, and has the potential to generate new potentially significant impacts, this alternative was eliminated, consistent with State CEQA Guidelines Section 15126.6(c). No changes to the environmental document are necessary in response to this comment.
SCSLC-14	The comment states that the Burton Mesa chaparral avoidance alternative does provide a range of housing types. Refer to response to comment SLSLC-13.
SCSLC-15	The comment cites the Urban Land Institute's report "Higher Density Development: Myth and Fact" to support increasing the density of existing and new communities. The proposed Dana Reserve Specific Plan would substantially increase the density of development within the Specific Plan Area. Refer to Section 5.3.2 of the EIR, which evaluates an alternative that would develop the site consistent with the existing Residential Rural land use designation. No changes to the environmental document are necessary in response to this comment.
SCSLC-16	The comment asserts that the argument that the Burton Mesa chaparral avoidance alternative would not provide affordable housing is contradicted by the statement in the alternative analysis that "This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs)." As discussed in Chapter 2, *Project Description*, one of the project objectives is to provide a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the General Plan, the County's Inclusionary Housing Ordinance (now repealed and no longer in effect), and regional housing needs. In concurrence with the goals and policies of the County's Housing Element and intent of the former Inclusionary Housing Ordinance (County LUO Section 22.12.080), the DRSP includes the proposed donation of NBD 10 to a local non-profit(s) to allow for the construction of a minimum of 75 affordable residential units on-site. Additionally, an overarching goal and vision of the project is to provide affordable-by-design housing geared towards first-time homebuyers and starter homes. Based on market research done by the project applicant, NBDs 1 and 2 would provide the most affordable market-rate housing within the Specific Plan Area. In addition, NBDs 3, 4, 5, and 6 would provide 1,300- to 2,400-square-foot homes on 3,000- to 5,000-square-foot lots; market studies conducted by the project applicant indicate that the majority of development within these neighborhoods would be within an affordable range for workforce housing. Although there is no mechanism for ensuring long-term affordability of market-rate housing, the DRSP includes standards for the design, density, and type of housing in an effort to feasibly meet its goals for affordability by design. In addition, the proposed Development Agreement includes a variety of additional elements aimed at ensuring affordability goals are met. As discussed in Chapter 5, *Alternatives*, the Burton Mesa Avoidance alternative would facilitate the future development of 815 residential units, including 704 four-story multi-family units and 111 two-story single-family units. This alternative would also have the potential to facilitate the development of accessory dwelling units (ADUs). Under this alternative, the project would not provide a diversity of housing types, including affordable homes and workforce housing. In addition, water and wastewater service by the NCSD would likely be prohibitively expensive. No changes to the environmental document are necessary in response to this comment.
SCSLC-17	The comment states the Burton Mesa Avoidance alternative is the only one that would substantially avoid or reduce impacts to biological resources while reducing air pollutants, GGH emissions, VMT, and unplanned population growth while rendering the project consistent with applicable plans and policies. Refer to responses to comments SCSLC-13 through SCSLC-16, above. No changes in the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.5 California Native Plant Society

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July 30, 2022

Jennifer Guetschow
San Luis Obispo County
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Sent via email to jGuetschow@co.slo.ca.us

Dear Ms. Guetschow:

These comments are submitted on behalf of the California Native Plant Society, San Luis Obispo Chapter regarding the Draft Environmental Impact Report (DEIR) for the proposed Dana Reserve Specific Plan project (Project). We have reviewed the DEIR and find the DEIR contains several deficiencies and believe it does not fully comply with CEQA. For the reasons detailed below, we believe the DEIR must be revised and recirculated to remedy these deficiencies.

The San Luis Obispo Chapter (CNPSSLO) of the California Native Plant Society (Society) focuses on the protection of and education about native plant species and their natural habitats in San Luis Obispo County and portions of northern Santa Barbara County. The Mission of the Society is to protect CA's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy.

This development project contemplates a total of 1,289 new residential units on three adjoining parcels totaling 288-acres outside the Urban Reserve Line in the Nipomo Mesa area. A General Plan Amendment would be required to expand the Urban Reserve Line. Land uses would be changed from Residential Rural to Residential Single Family, Recreation, Residential Multi-Family and Commercial. The Dana Reserve Project is one of, if not the, largest proposed housing projects in San Luis Obispo County. We believe the project as proposed is too large for the site and must be reduced in size.

CNPS-1

Thank you for the opportunity to comment on this Project.

I. The Project is inconsistent with its own identified Objectives (Project Description comments)

CEQA Section 15124(b) states "The statement of objectives should include the underlying purpose of the project and may discuss the project benefits." While the DEIR presents the objectives of the Project (DEIR at 2-13), it does not include a clear statement of the underlying purpose of the project. Furthermore, it is noteworthy that several of the objectives are in apparent conflict with Objective 9, which states "to maintain the large, centrally located oak woodland

CNPS-2

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area…and to minimize impacts to special status plants and animals on site." The Project does little to minimize impacts to the oak woodland, oaks, and special status plant and animals. As discussed in the DEIR (Section 4.4) and below, it results in significant, unavoidable impacts to each of these resources.

CNPS-2 (cont'd)

II. The benefits of the Project as Listed on Page 2-14 of the DEIR are Questionable

The DEIR on page 2-14 also refers to the County's Memorandum of Agreement and some of the benefits the County may receive from implementation of the Project. Listed here are:

A. **"Implementing the County's stated land use goals.**" We believe that, on balance, the Project's inconsistencies with goals and policies, especially Open Space and Biological Resource policies, in addition to substantial unplanned population growth as discussed below in this letter, outweigh whatever land use goals are being referred to here. Therefore, this is not a benefit of the project.

CNPS-3

B. **"Dedication of an Open Space Easement, neighborhood park, and trail system.**" While we acknowledge the applicant's set-aside of 17 acres of oak forest in an open space area, it is notable that this area is on steeper slopes and building in this area would be difficult regardless. According to the DEIR, and as spelled out below, the proposed Open Space protects only 4% of the oak woodlands on site, and 3% of the Burton Mesa chaparral.

CNPS-4

C. **"Providing for affordable housing in furtherance of the County's Housing Element…**" Trading the unique biological resources of the Nipomo Mesa for a project that may not achieve affordable housing goals is not a benefit and is not supportable.

CNPS-5

D. **"Permanent conservation of 388 acres of oak woodland or similar habitat located off-site."** As it is zoned agriculture and is located on steep slopes, the proposed Dana Ridge 388-acre site is not threatened with development. The proposed conservation easement is not functional mitigation for the significant and unavoidable impacts of the project on oak trees, oak woodlands, and oak forest habitats. This is not a benefit of the project.

CNPS-6

III. The DEIR Fails to Adequately Address Biological Impacts

The DEIR identifies six Class I impacts to biological resources; we concur with those identified; however, we believe several have not been recognized as such (there are 10 Class I biological impacts, as discussed below) in addition to other issues.

CNPS-7

A. Allowing Burton Mesa chaparral mitigation outside SLO County, or even off the Nipomo Mesa, is inadequate mitigation

The DEIR on page 4.4-72 discusses the impacts to Burton Mesa chaparral, specifically the loss of 35 acres. The DEIR acknowledges that on-site mitigation opportunities are limited under the



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current project design; it further acknowledges that due to the limited nature of the community, even off-site mitigation opportunities are limited, and its feasibility is questionable. However, *BIO/mm-14.1,* while first stating that the protection, enhancement, and/or restoration of contiguous patches of Burton Mesa chaparral on the Nipomo Mesa is preferred, which we agree with, the mitigation still contemplates the fulfillment of this requirement by restoring Burton Mesa chaparral in Santa Barbara County (at an additional 2:1 ratio). This is not appropriate. CEQA requires that mitigation be "like for like" – allowing mitigation in an adjacent County should not be acceptable, just like allowing mitigation for loss of oak woodlands in an adjacent County would not be acceptable. While mitigation banks have been developed for wetland resources, and certain endangered species where an HCP has been prepared, we are not aware of this being done for this natural community. Why should SLO County forfeit its resources when the impact can be avoided?

CNPS-7 (cont'd)

B. Off-site compensation for oaks and oak woodland is not a functional mitigation, and Dana Ridge is not an appropriate mitigation site for loss of oaks and Oak Woodland (Impacts 15 and 18)

The DEIR at 4.4.74 Mitigation *BIO/mm-15.1* addresses Off-Site Mitigation for Coast Live Oak Woodland (*Quercus agrifolia / Adenostoma fasciculatum – [Salvia mellifera*]). Here conservation of oak is addressed in the context of the ecosystem in which it is found, rather than as an isolated species. CNPS supports the analysis of the substitute habitat requirements, but also notes that locating suitable habitat may be impossible to either find or acquire. This is noted under "residual impacts" of BIO Impact 15 (Class 1) on DEIR page 4.4-75.

CNPS-8

The DEIR summarizes impacts to Oak Woodlands in Impact 18 (DEIR at 4.4-79-82), in the context of a conflict with local plans and policies. The DEIR presents, in BIO/mm-18.1, at least four pages of detail on how to minimize damage to oaks that are retained on site. BIO/mm-18.2 requiring an Oak Tree Replacement Plan (DEIR at 4.4-89) appears very complex, involving the essential re-creation of the habitat at some unknown off-site location, with some 40 species of plants listed as being part of such mitigation effort or of other landscaping. BIO/mm-18.3 requires the protection of oaks on site through the development of an Oak Woodland Protection and Restoration Plan (DEIR at 4.4-91) that includes fuel management measures. BIO/mm-18.4 requires off-site preservation of oak woodlands and forest at a 2:1 ratio (DEIR at 4.4-92) and identifies the applicant-proposed "mitigation" of conserving Dana Ridge Ranch. CNPS has for years had a Policy of not recognizing off-site compensation as mitigation.[1] In this instance, the Dana Ridge site is not appropriate for several reasons: (1) it is not threatened with development; (2) it is not visible or accessible to the residents of Nipomo; (3) it contains steep slopes that are most likely unbuildable; (4) it is introduced solely as a false claim to mitigate the large net losses to oak resources; and (5) it would be subject to the very restrictive oak removal standards of the County Oak Ordinance, and therefore oaks on the site would be effectively protected by that ordinance in the absence of any connection to Dana Reserve.

CNPS-9

[1] California Native Plant Society. 1998. Policy on Mitigation Guidelines Regarding Impacts to Rare, Threatened, and Endangered Plants. Available online at cnps.org.

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At DEIR Section 4.4.2.2.3 Oak Woodlands Conservation, the application of Senate Bill 1334 enabling of a destructive 'oak management plan' is described. We object to the use of an 'oak woodlands management plan' as an instrument to avoid the intent of the County Oak Ordinance to conserve oak trees with the no-net-loss policy. The developer is using the 'management plan' as a vehicle to implement a clause in Senate Bill 1334 to mitigate through use of conservation easements, (PRC 21083.4 (b) (1)), although this clearly violates the spirit of the County Oak Ordinance. In addition, the allowance under SB 1334 that mitigation will allow planting an "appropriate number of trees" (PRC 21083.4 (b) (2) (A)), with obligation to maintain the trees ending after seven years (PRC 21083.4 (b) (2) (B)) would not result in any certainty that trees would survive to maturity. SB 1334 also states that plantings "shall not fulfill more than one-half of the mitigation requirements of the project" (PRC 21083.4 (b) (2) (C)). **CNPS-10**

It seems much more realistic and prudent to simply protect the existing oak woodland and have a smaller project. This avoids the costly, difficult, and lengthy task of trying to re-create the habitat, which, if successful, would take years to truly accomplish. The record is mixed at best. For example, the recent mitigation effort to replace removed oaks from the nearby Willow Road interchange at Highway 101 has gone on for at least seven or eight years at immense expense at a poorly chosen location (wrong soil type) and can be judged a failure. **CNPS-11**

C. The impacts to Pismo Clarkia, Federally and State-listed, are not accurately represented (Bio Impact 2)

The DEIR indicates that eight "micropopulations" of Pismo Clarkia occur onsite (DEIR at 4.4-17 and Figure 4.4-5), having been documented during 2019 and 2020 surveys, but not in 2017 and 2018. Bio Impact 2 identifies potential direct and indirect impacts to Pismo Clarkia. Direct, unavoidable impacts are identified as loss of 0.02 acres of the 0.2 acres occurring onsite (DEIR at 4.4-53, Figure 4.4-9) from the construction of the arterial road "Collector B." The DEIR includes three mitigations, BIO/mm 2.1-2.3, that include obtaining an incidental take permit from CDFW, establishing a conservation easement, preparing a Habitat Management Plan, in addition to avoidance of patches identified during 2019 and 2020, in addition to the construction year. Further mitigation is required for the loss of the 0.02 acres, at a 3:1 ratio, "along appropriate boundaries of preserved oak woodland habitat areas" (DEIR at 4.4-56). The DEIR concludes impacts are significant but mitigated to insignificance. We disagree and believe the impacts are significant and unavoidable (Class I). **CNPS-12**

CNPS experts have been involved in efforts to restore Pismo Clarkia[2]. Pismo Clarkia is indeed a "sensitive" species: the patches are shifting and delicate — they can be extinguished by too much stability or too much impact and require the underlying soil and animal associates to be suitable. Translocation of populations and topsoil stockpiling may be successful for one or two

[2] Arcadis, 2009. Pismo Clarkia Restoration Study 2009 (Year 1) Mitigation and Monitoring Report, PXP – Arroyo Grande Oilfield, Pismo Beach, CA. Prepared for Plains Exploration and Production Company, 5640 South Fairfax Avenue, Los Angeles, CA 90056.



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years, but with continued monitoring, the translocated and managed populations head toward steep and terminal decline. There are also issues with herbivory when treatments are placed next to oak woodlands and scrub types where there is adequate cover for brush rabbits. It is also doubtful that construction can be limited to what appears to be a small 50-60 ft. corridor for Collector B, which is also a corridor for water mains (DEIR at 2-9). Given this, the impacts to Pismo Clarkia are significant and unavoidable. CNPS has access to data supporting the long-term failure of Pismo Clarkia transplantation efforts which can be supplied on request.

CNPS-12 (cont'd)

D. The impacts to Mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita are not accurately represented (Bio Impact 3)

The DEIR on page 4.4-57 identifies impacts to these species and states that impacts can be mitigated to insignificance through the implementation of BIO/mm-3.1 (preservation on or off-site at 1:1 and restoration at 2:1, respectively through a Habitat Mitigation and Monitoring Plan), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); and 15.1 (protect/restore oak woodland at 2:1 ratio). The DEIR states, on page 4.4-59:

"Therefore, it is imperative to preserve an existing population of each species at a 1:1 ratio along with enough suitable unoccupied habitat to reestablish populations prior to issuance of the grading permit. Preservation of an existing population will offset the temporal loss incurred until the reestablishment component of the mitigation can be successfully implemented. This is imperative because it is not always possible to successfully reestablish rare plants (CNPS 1998)."

The DEIR does not include locations of existing populations that would be preserved, and it is not assured that they will be found. Until these habitat areas are located and can be assured to be protected, impacts would be **significant and unavoidable (Class I.)**

CNPS-13

E. The DEIR fails to accurately assess impacts to migratory birds (no impact identified)

It is widely recognized that both migratory and resident bird populations depend on intact, healthy habitat. The Conservation and Open Space Element of the General Plan's Goal BR-1 states: "*Native habitat and biodiversity will be protected, restored, and enhanced."* This Project is clearly inconsistent with this Goal, in addition to Policy BR 1.1: "*Protect sensitive biological resources."* The DEIR concludes that there is no potential impact and there are no identified wetlands or wildlife movement corridors. CNPS strongly rejects this conclusion and finds that it fails to recognize that oak woodlands are often the terminus of either wintering species or nesting species, providing major food resources to species.

CNPS-14

F. Impacts to Nesting Birds are Significant and Unavoidable (Class I)

The DEIR on page 4.4-65 identifies impacts to nesting birds and states that impacts can be mitigated to insignificance through the implementation of BIO/mm 7.1 (pre-construction surveys

CNPS-15



and nest avoidance), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); 15.1 (protect/restore oak woodland at 2:1 ratio); and 18.4 (off-site preservation of oak woodland at 2:1). However, the DEIR concludes for Impact 14, 15 and 18, for which these mitigations are proposed, that impacts are significant and unavoidable (DEIR at 4.4-73, 4.4-75, and 4.4-92). Given the substantial loss of habitat (Burton Mesa chaparral, oak woodland, oak forest) that would result from the Project, and the management of the Open Space that would remain, and the fact that these impacts are unavoidable, we believe that impacts to nesting birds are also significant and unavoidable Class I).

CNPS-15 (cont'd)

G. Impacts to American Badger are Significant and Unavoidable (Class I)

The DEIR on page 4.4-67 and 68 identifies impacts to American badger, A CDFW species of special concern, and states that impacts can be mitigated to insignificance through the implementation of BIO/mm 9.1 (badger den preconstruction survey and relocation), in addition to BIO/mm 1.1-1.6 (construction protective measures), 14.1 (protect/restore Burton Mesa chaparral); 15.1 (protect/restore oak woodland at 2:1 ratio); and 18.4 (off-site preservation of oak woodland at 2:1). As stated above under Item F., the impacts for which these mitigations are proposed are significant and unavoidable. Given the substantial loss of habitat (Burton Mesa chaparral, oak woodland, oak forest) that would result from the Project, and the management of the Open Space that would remain, and the fact that these impacts are unavoidable, we believe that impacts to American badger are also significant and unavoidable (Class I). It is likely that American badger would be extirpated from the area due to the loss of open grassland habitat. American badger home range estimates are extremely variable across their range. While they will travel up 6 miles in search of prey,[3] two to two and a half square miles (1327-1549 acres) is typical for a male in California.[4]

CNPS-16

IV. The DEIR Fails to Address Certain Issues Relating to Water Resources

A. The DEIR fails to address the dependence of the project on water imported by Nipomo Community Services District which should otherwise have been used to counter continued decline of groundwater storage in the area

CNPS concurs that the project will not directly contribute to the continuing decline in water storage under the Nipomo Mesa. This is because the project will only use imported water brought by pipeline from Santa Maria through the Nipomo Supplemental Water Project (NSWP).

Nipomo CSD has stated that the amount of imported water is sufficient to serve both this project and other potential future projects within the NCSD service area, while not contributing to pumping from Nipomo Mesa sources. The allocation of this imported water to serve future

CNPS-17

[3] U.S.G.S. Western Ecological Research Center. 2017. Accessed 2022. American Badgers in San Diego County. https://www.usgs.gov/centers/werc/science/american-badgers-san-diego-county
[4] CDFW. 1988-1990. California Wildlife Habitat Relationship System. American Badger Life History Account. Originally published in Zeiner et al., 1988-1990. California's Wildlife. Vol I-III.



development may severely constrain the use of the water in recovering groundwater levels in the basin.

The Nipomo Mesa Management Reports for 2020[5] and 2021[6] reveal a loss of groundwater storage of 8,807 AF in 2021 and 8,582 AF in 2020. This is also demonstrated by the Key Wells Index which shows continuing declines in well levels. In addition, the Reports show that groundwater extraction from the Nipomo Mesa Management Area was 13,677 AF in 2021 and 14,313 AF in 2020. This implies that about half of the extractions were mined from storage at a time when supplemental water was importing in 3,002 AF in 2021 and 3,809 AF in 2020.

CNPS-17 (cont'd)

NCSD notes that supplemental water imports could be as high as 3,000 AFY, which is less than half of the ongoing deficit. This raises the issue that imported water should first be dedicated to recharging the basin beyond the quantities currently being substituted at the well head by water imports.

Wastewater from the project will be treated at the Southland Wastewater Treatment Facility, which is situated at the extreme southeast corner of the Nipomo Mesa, and close to the 130 ft. high bluff bordering the Santa Maria River. Nipomo Mesa Management Reports illustrate groundwater contours showing flow to the southwest, so that it is extremely unlikely that the Southland plant will recharge the production aquifers beneath the Mesa, and more likely returning water to the Santa Maria area. It is also possible that the enhanced riparian vegetation in the creek on the opposite side of the freeway is evidence of recharge from the treatment plant. CNPS does not find evidence that the imported water would recharge the aquifers utilized in creating the Key Wells Index.

CNPS-18

B. The DEIR fails to accurately point out inconsistencies with County policies

The DEIR on page 4.10-13, 14, 15 lists several policies from the Conservation and Open Space Element of the County General Plan. We offer the following observations:

(a) *General Plan Policy BR 4.1 Protect stream resources: Protect streams and riparian vegetation to preserve water quality and flood control functions and associated fish and wildlife habitat*. The conclusion of 'Potentially Consistent' cannot be made in view of the well-documented drawdown of water tables affecting Black Lake Canyon and associated wetlands. The project does not contribute to recovery of local water tables, and the increased impermeable surface generated by the project may inhibit local recharge.

CNPS-19

(b) *General Plan Policy BR 4.4 Vegetated Treatment Systems (Low Impact Development Techniques). Promote use and maintenance of engineered, vegetated treatment systems*

CNPS-20

[5] Nipomo Mesa Management Area, 2021. Thirteenth Annual Report, Calendar Year 2020. Prepared by NMMA Technical Group. Submitted April 2021.
[6] Nipomo Mesa Management Area, 2022. Fourteenth Annual Report, Calendar Year 2021. Prepared by NMMA Technical Group. Submitted April 2022.



such as constructed wetlands, vegetated swales, or vegetated filter strips where they will reduce nonpoint source pollution from private and public development. The conclusion of 'Potentially Consistent' is speculative, as project plans show no substantial treatment areas to compensate from the pollution from the large number of vehicles and people using the area. This would include distributed waste from pets and other byproducts of human occupation not currently present at the site. Furthermore, pollutants might be concentrated at the collection ponds where natural soil processes would be less available for any current distributed treatment currently present at the site.

CNPS-20 (cont'd)

(c) *General Plan Policy SL 2.1 Protect watersheds and aquifer recharge areas. Give high priority to protecting watersheds, aquifer-recharge areas, and natural drainage systems when reviewing applications for discretionary development.* By design, this project increases impermeable surface and concentrates runoff water in basins situated at the perimeter of the project. Given that fine sediment and colloidal sediment load will also be concentrated in these basins, it is likely that recharge capacity will decrease over time. Table 4.10-2 shows that basin-provided storage volume totaling 1,249,104 cu. ft is more than the code required capacity of 1,086,134 cu. ft. and therefore fully mitigated. We have concerns that the hydrologic calculations do not address the expected increased intensity of storms associated with global warming and the increased chances of atmospheric rivers hitting the central coast. We also do not see any provision in dealing with any basin overspill during such events. For example, the basin adjacent to Pomeroy would spill into residential neighborhoods, and overspill from the northeast pond would spill beneath the freeway onto the highly erodible slopes on the far side.

CNPS-21

(d) *General Plan Policy WR 1.9 Discourage new water systems. Enable expansion of public services by community services districts and County service areas to serve contiguous development when water is available. Strongly discourage the formation of new water and sewer systems serving urban development at the fringe and outside of urban or village reserve lines or services lines. Strongly discourage the formation of new mutual or private water companies in groundwater basins with Resource Management System Levels of Severity I, II, or III, except where needed to resolve health and safety concerns.* We find that while the statutory wording of "new water system" may not seem to apply to the intention of NCSD to serve this development, this is in fact a new water system consuming imported water. As the groundwater condition is at RMS Level of Severity III, this would have prevented the developer from making a water import contract that was not channeled through NCSD, and therefore we find that this General Plan policy has been violated in spirit, if not in law. Furthermore, as we have noted in our comments at the start of this section, imported water would have been better utilized in recharging the groundwater rather that servicing new demand.

CNPS-22

(e) *General Plan Policy WR 1.13 Density increases in rural areas. Do not approve General Plan amendments or land divisions that increase the density or intensity of non-agricultural uses in rural areas that have a recommended or certified Level of Severity II*

CNPS-23



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or II for water supply until a Level of Severity I or better is reached unless there is an overriding public need. The DEIR notes "*The intent of this policy is to encourage infill development and conserve water resources*." As this development is at the northeastern margin of the NCSD service area, it hardly qualifies as infill. NCSD water service to an area north of the proposed development was emplaced as an emergency measure after that area ran out of water.

CNPS-23 (cont'd)

(f) *General Plan Policy WR 1.14 Avoid net increase in water use. Avoid a net increase in non-agricultural water use in groundwater basins that are recommended or certified as Level of Severity II or III for water supply. Place limitations on further land divisions in these areas until plans are in place and funded to ensure that the safe yield will not be exceeded.*
Framework for Planning Policy 3 Preserve and sustain important water resources, watersheds, and riparian habitats.
As noted elsewhere, the developer claims that the use of 100% imported water results in no violation of this policy. However, it is clear that basin safe yield is currently exceeded, and this is a 'further land division'. There is also a net increase in water use. As the project is solely dependent on imported water subject to legal agreements that could change over time, the project might at some future time need to depend on local groundwater.

CNPS-24

(g) *Policy WR 3.3 Improve groundwater quality. Protect and improve groundwater quality from point and non-point source pollution, including nitrate contamination; MTBE and other industrial, agricultural, and commercial sources of contamination; naturally occurring mineralization, boron, radionuclides, geothermal contamination; and seawater intrusion and salts.* It is fairly obvious that human occupation will not improve over the water quality of water filtered by woodland and grassland, in spite of any mitigation imposed on the project.

CNPS-25

In conclusion, even though water for the project would be supplied by the NCSD using imported water, we note several apparent policy inconsistencies, and importantly, that the project does not contribute to recovery of local water tables.

CNPS-26

V. Air Quality, Greenhouse Gas Emissions, and Transportation

Regarding Air Quality, the DEIR also identifies that the project would conflict with the SLOAPCD Clean Air Plan, including inconsistencies with Land Use Planning Strategies L-3 Balancing Jobs and Housing (AQ Impact 1, DEIR at 4.3-25). Impacts would be significant and unavoidable (Class I). In addition, the DEIR states that the project would result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD daily emissions thresholds (AQ Impact 3, DEIR at 4.3-32). Impacts would be significant and unavoidable (Class I).

CNPS-27



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Regarding Greenhouse Gas Emissions, the DEIR also identifies that the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 Regional Transportation Plan/Sustainable Communities Strategy and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain (GHG Impact 3, DEIR at 4.8-28, 29). Therefore, even with implementation of identified mitigation, potential impacts would be significant and unavoidable (Class I). Cumulative impacts would also be significant and unavoidable (GHG Impact 5, DEIR at 4.8-30).

The DEIR Vehicle Miles Traveled (VMT) analysis concluded that the project's estimated VMT per Employee and residential VMT per capita are higher than the regional averages and that the project would generate an increase in regional VMT (DEIR at 4.17-40). Thus, buildout of the Specific Plan Area would exceed County VMT Thresholds of Significance and result in a significant impact. At buildout, the project would result in an overall increase in regional VMT and exceed County thresholds, resulting in a **significant and unavoidable impact to VMT** (TR Impact 3). This is also inconsistent with State CEQA Guidelines Section 15064.3(b). The DEIR at 4.17-48 also identifies **significant and unavoidable cumulative VMT impacts** (TR Impact 9).

CNPS-27 (con't)

VI. Section 4.11 - The DEIR Fails to Establish Consistency with Applicable Plan and Policies

The EIR identifies potential inconsistencies with policies relating to air quality, biological resources, GHG emissions, transportation, land use planning, public services, and recreation. We emphasize several of these inconsistencies below.

A. The project would be inconsistent with the County General Plan, Conservation and Open Space Element, in addition to other elements of the General Plan.

As identified in the DEIR, the project would be inconsistent with several goals and policies of the Conservation and Open Space Element: Goal BR1 (Native habitat and biodiversity protection), Policy Br 1.2, 1.4, 1.9 and 2.6 (DEIR at 4.11-30). Goal BR3 requires the maintenance of the acreage of native woodlands, forests, and trees at 2008 levels. As stated above, the project would result in the direct loss of 35 acres of Burton Mesa chaparral (97%), 75 acres of oak woodland (96%), and 21.7 acres of oak forest. The project is thus inconsistent with this Goal, and Policies 3.1, 3.2, and 3.3, which relate to native tree protection and oak woodland preservation (DEIR at 4.11-31). The inadequate 1:1 replacement ratios and the extremely low on-site replacement of only 194 of the 3,943 trees to be removed supports this determination. The DEIR on page 4.11-37 concludes that **LUP Impact 5** (loss of habitats and resultant policy inconsistency) would be significant and unavoidable. We agree with this determination and suggest that this points to another alternative.

CNPS-28

From the standpoint of visual resources, Goal 2 requires that the natural and historic character and identity of rural areas be protected. The DEIR finds that the project "would inherently



change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration" (DEIR at 4.11-29). The project is inconsistent with this Goal.

Policy VR 2.1 requires that the review of proposed development encourage designs that are compatible with the natural landscape and with recognized historical character and discourage designs that are clearly out of place within rural areas. The DEIR finds that the project "would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration" (DEIR at 4.11-29). The project is inconsistent with this policy.

Policy VR 2.2 requires that the review of proposed development encourage designs that emphasize native vegetation and conform grading to existing natural forms, with abundant native and/or drought-tolerant landscaping that screens buildings and parking lots and blends development with the natural landscape. The DEIR finds that "Although the project site would preserve the existing oak ridge, it would severely alter the existing native vegetation and natural landforms of the remainder of the site with the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration" (DEIR at 4.11-29). The project is inconsistent with this policy.

CNPS-28 (cont'd)

B. The project would be inconsistent with Framework for Planning (Inland).

As identified in the DEIR, the project is inconsistent with Principles 1 and 2 and Policies 1 and 2 of these respective principles of Framework for Planning (note the incorrect spelling of principle). These policies guide the retention and preservation of open space and natural resources, and the rate of growth in the area (DEIR at 4.11-32).

Principle 1 relates to the preservation of open space, scenic natural beauty, and natural resources, the conservation of energy resources and the protection of agricultural land and resources. The DEIR finds that "Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration" (DEIR at 4.11-32). The project is clearly inconsistent with this.

In addition, Principle 2, Policy 1 requires that rural areas be maintained in "very low-density residential uses." The project through its large number of residential units and commercial uses would change the character of the area and thus be inconsistent with this policy. The DEIR on page 4.11-39 and 4.11-40 is inconsistent. On page 4.11-39 the DEIR indicates that **LUP Impact 7** is Class I, yet the textual discussion regarding Aesthetics that follows, and the table on page 4.11-40, indicates it is Class II. This should be rectified. Inherent in these principals and policies is the protection of resources. We believe **LUP Impact 7** is a Class I impact.

CNPS-29



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C. The project would be inconsistent with County of San Luis Obispo Land Use Ordinance 22.10.095 – Highway Corridor Design Standards.

The DEIR finds that "The project would inherently change the visual character of the site and surroundings through the introduction of roads, commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration within highly visible locations as seen from US 101 (DEIR at 4.11-33). CNPS-30

D. The project would be inconsistent with the South County Inland Area Plan.

The project would be inconsistent with several guidelines, goals, and supportive goals of the South County (South) SubArea. A key guideline requires "retain land in open space in new land divisions that will preserve oak woodlands, riparian and other important biological habitats (emphasis added), and historic place surroundings." (DEIR at 4.11-34). The project is clearly inconsistent with this guideline in that it retains only 3% of the Burton Mesa chaparral and 4% of the oak woodland on site as Open Space. A key supportive goal is stated as follows, in part: "Promote the protection of natural resources and encourage the following in new development proposals: a. retention of sensitive vegetation…" (DEIR at 4.11-35). The removal of over 4,000 mature oak trees and 35 acres of Burton Mesa chaparral is wholly inconsistent with this. While several of the other policy inconsistencies mentioned above are discussed under **LUP Impacts 5, 6, and 7**, it is not clear where this inconsistency is addressed. We believe this to be a Class I impact. CNPS-31

E. The project would result in cumulative impacts associated with Policy Inconsistency.

We believe the DEIR correctly concludes "cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character would be *significant and unavoidable*. One can only conclude that the DEIR **fails to adequately establish consistency with applicable plans and policies.** CNPS-32

F. The DEIR mischaracterizes some plan inconsistencies as consistencies or leaves out discussion altogether.

Several of the policies in the Policy Consistency section are mischaracterized as potentially consistent, with a few specifics listed below, for the reason stated. CNPS-33



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Policy	Intent	EIR Mischaracterization and Reason for Inconsistency
COSE Pol OS 1.1	Protect open space resources	DEIR indicates potentially consistent at 4.11-9 and 4.4-47. **Inconsistent** is correct. Only 17% of the SP area is protected as OS when most of the site is sensitive habitat (oak woodlands, BM chaparral, etc.) that would be lost to development.
COSE Policy OS 1.8	Maximize protection of environmentally sensitive resources	DEIR indicates potentially consistent at 4.11-9. **Inconsistent** is correct. The proposed OS area protects very little of the sensitive site resources. Except for Pismo Clarkia and mesa horkelia, DEIR Figure 4.4-3 & 4.4-8 shows that most sensitive species occur outside the proposed open space area and would be impacted. Stormwater basins provide minimal to no value as site resources.
COSE Policy OS 2.1	Protect, sustain, and restore open Space	DEIR indicates potentially consistent at 4.11-9. **Inconsistent**, as above. In addition, management by a homeowner's association raises the possibility of future impacts.
Framework Principle 1, Pol 7	Maximize avoidance of sensitive environmental resources through site design.	DEIR indicates potentially consistent at 4.11-11. **Inconsistent** is correct. Considering the "large, centrally-located oak forest" (approx. 16-17 acres) to be avoidance of sensitive resources is a mockery given the prevalence of several rare plant species, >4,000 oaks, and 132 acres of sensitive habitats that will be lost due to this project (DEIR, Table 4.4-7).
Framework Principle 1, Pol 1		DEIR indicates potentially consistent at 4.11-11. **Inconsistent** is correct. Appears in DEIR on page 4.11-11 as potentially

CNPS-33 (cont'd)

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Policy	Intent	EIR Mischaracterization and Reason for Inconsistency
		consistent; on page 4.11-32 as potentially inconsistent. Clarify. We believe inconsistent is correct.
Framework Principle 2, Pol 1		DEIR indicates potentially consistent at 4.11-11. **Inconsistent** is correct. Appears in DEIR on page 4.11-11 as potentially consistent; on page 4.11-33 as potentially inconsistent. Clarify. We believe inconsistent is correct.
Framework Principle 2, Pol 2		**Inconsistent** is correct. Appears in DEIR on page 4.11-11 as potentially consistent; on page 4.11-33 as potentially inconsistent. We believe inconsistent is correct.
Title 22 County of San Luis Obispo Land Use Ordinance Section 22.98.072 (H)(8), Land Use Category Standards for the South County Sub-area, Residential Rural (RR), Dana Ranch [aka Dana Reserve]	"*b.* ***Oak habitat preservation****. Designation of the existing oak forest habitat for open space preservation, where limited recreational and open space uses may be allowed.* "	**Inconsistent.** Restated in DEIR at 4.4-38, but consistency not addressed. The section requires conserving the existing oak forest habitat on site. Project does preserve 17 of 21.7 acres of oak forest, but it removes 75 acres of oak woodland. The Project is inconsistent for reasons noted above.
Title 22.58, LUO, Oak Woodland Ordinance	*"To maintain the character of the existing landscape and promote oak woodland management independent of regulation."*	**Inconsistent.** Summarized in DEIR at 4.4-37. Notably, consistency is not addressed in DEIR. The Project requests a CUP under the Ordinance. However, the Ordinance came about due to public pressure because of massive oak tree removal from Agricultural activities. It is antithetical to the intent that the Ordinance is now being used to support this request.

CNPS-33 (cont'd)

VII. The DEIR Alternatives Analysis is Inadequate and Fails to Comply with CEQA **CNPS-34**

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The Alternatives Section of the DEIR summarizes the Class I impacts of the project (DEIR at 5-3 through 5-6), describes alternatives considered but discarded (5-8 through 5-11), and analyses the No-project alternative and five other alternatives, defined roughly as follows:

- Alternative 1- applicant-preferred alternative, which moves neighborhood 10, the affordable housing area, out of an oak woodland area and into a more centrally located area of the site, and allows as many residential units as the Project (1,289);
- Alternative 2 – La Canada Ranch alternative, which would vastly increase the amount of open space, and allow only 535 residential units;
- Alternative 3 – Residential Rural Cluster alternative, which would include a similar amount of open space as the Project, remove the commercial development, and would allow anywhere from 78 to 390 residential units;
- Alternative 4 – Development on Non-Native Grassland alternative, which would vastly increase the amount of open space to 183 acres and include a 15% reduction in residential units to 1,100 (and also changing the ratio of RSF to RMF); and
- Alternative 5 - Gradual Transition alternative, which includes open space similar to the Project, but would include a 12% reduction in residential units to 1,135 (and also changing the ratio of RSF to RMF.

CNPS-34 (cont'd)

The above alternatives differ in their feasibility and ability to reduce Class I impacts and inconsistencies with County plans and policies.

Significantly, the DEIR rejects an alternative, the Burton Mesa chaparral avoidance alternative, because "it may be infeasible from a cost perspective" (DEIR at 5-9). This alternative would preserve 205 acres in open space, and depending on how the units are allocated, could allow up to 600-700 residential units, although the DEIR claims 815, based on 111 RSF units, and 704 RMF units. We believe this to be the Environmentally Superior Alternative, as discussed further below, along with other comments on alternatives.

A. The alternatives presented fail to optimize for affordable housing while maximizing conservation of oak woodlands (DEIR page 5-57)

The DEIR analysis concludes for Alternatives 2 through 5 that there is failure to meet the project objective of providing a diversity of housing types…, including affordable housing (DEIR at 5-32, 5-44, 5-57, 5-69.) For alternatives 2 and 3, the DEIR uses this to argue against the feasibility or acceptance of the alternative (DEIR, as referenced above). For alternatives 4 and 5, it again uses this to downplay the feasibility of the alternatives. If this objective is so important, why weren't more alternatives that would meet this objective selected and analyzed?

CNPS-35

Because (a) the proposed project is vastly inconsistent with the existing general plan, as evidenced Section VI above; and (b) in consideration of the need for affordable housing being listed as a supporting criterion for choice of certain alternatives; we suggest that another alternative should be considered. This alternative would minimize general plan inconsistencies



and optimize housing needs, so that the same number of units could be placed on the eastern half of the project area. Rather than have four fifths of the development unaffordable, all units could be made affordable rather than the currently proposed one fifth of the development. This could be achieved through multistory apartment units or some other such accommodation.

CNPS-35 (cont'd)

B. The analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives.

Furthermore, it is notable that this one project objective, Objective 5 on page 5-2 of the DEIR, ("to provide a diversity of housing types…") is used to downplay the feasibility of each of these alternatives when the same reasoning could be used in the opposite manner for Objective 9, ("To maintain the large centrally located oak woodland area as a site feature and to minimize impacts to special status plants and animals on site.") We believe the analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives. We find no language in the project description stating that the fundamental purpose of the project is to supply affordable housing, It may be an objective, but it is not a stated purpose. In fact, the project description contains no statement of purpose for the project. CEQA Section 15124(b) states "The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."

CNPS-36

It is also worth noting that the DEIR in this section, 5.2.1, Project Objectives, does not use the word "basic" (DEIR, page 5-2), while numerous times in the alternatives analysis (DEIR at 5-9, 5-11, 5-32), text refers to "basic project objectives," when there are no such identified "basic project objectives. There are just project objectives, supposedly equally weighted. (This is also the wording in Section 2.4, Project Objectives, in the Project Description (DEIR at 2-13).

C. The DEIR does not adequately analyze the Burton Mesa Chaparral Avoidance Alternative and rejects the alternative without providing substantial evidence of infeasibility (DEIR page 5-8)

This alternative results in development being placed at the eastern end of the site. (DEIR Figure 5-1, page 5-10). As currently defined in the DEIR, it would result in 205 acres being dedicated to Open Space; 61 acres would be devoted to residential uses (DEIR at 5-8). A total of 815 units, as opposed to 1,289 under the Project, would be possible. Notably, it is described as including four-story residential multi-family units, and two-story single-family units. This alternative is clearly the environmentally superior project. It appears to be rejected, among other reasons, due to the aesthetic impact of inclusion of four-story apartments or condominiums and two-story single-family homes. We find this to be without merit; a smaller 600–700-unit project (which would still be quite large for this County) could easily be designed to have lower buildings, which would eliminate the impact to aesthetics.

CNPS-37

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The idea that accessory dwelling units (ADUs) could elevate the impact of the project is an issue common to nearly all the considered alternatives, and not a reason to reject this Burton Mesa Chaparral Avoidance alternative.

The DEIR dismisses the Burton Mesa alternative as (1) not meeting the "most of the basic objectives" of the project, and (2) as "may be infeasible from a cost perspective (DEIR at 5-9). We reject both assertions.

CNPS-37 (cont'd)

This alternative keeps all the various housing types in the project proposal; it simply changes the ratios by eliminating the tract home neighborhoods that require removal of the oak woodland.

With a few minor changes, the BMC avoidance alternative could provide a greater range of housing types than the developer's proposal. The commercial area could be slightly reduced to make room for more homes. Reviewing the project objectives, the BMC avoidance alternative can fulfill all 13 of them. To wit:

- It meets Objective 1 because it provides a mix of land uses (OS, MFR, SFR, FC, REC all shown in Fig 5-1).
- It meets Objective 2, respect for Old Town Nipomo, because village commercial can remain, simply reduced in size.
- It meets Objective 3, regarding parks and open space areas with a network of trails, because there is essentially no change from the Project, just a smaller project.
- It meets Objective 4, Rural history through arch design, since there is no change from the Project.
- It meets Objective 5, a Diversity of housing types, including affordable housing, since there is no change from the Project.
- It meets Objective 6, new employment and job training opportunities, since there is no change from the Project.
- It meets Objective 7, to enhance circulation within the Specific Plan Area and in the area, (but much of this is required *because* of the Project);
- It meets Objective 8, to integrate a network of walking, bicycling, and equestrian facilities because this remains possible in a reduced area.
- It meets Objective 9, to maintain a large centrally located oak woodland (see Figure 5-1);
- It meets Objective 10, to meet County energy requirements, since there is no change from the Project.
- It meets Objective 11, to reduce uncertainty in planning since there is no change from the Project, it's just a smaller project.
- It meets Objective 12, for effective and efficient development of public facilities, infrastructure, and services since there is no change from Project, just a smaller project.
- It meets Objective 13, to meet the requirements of the NCSD.

CNPS-38



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No substantial evidence is provided to show why the BMC avoidance alternative is not feasible. For these reasons the dismissal of this alternative is rejected, and we request that more detailed analysis of this alternative be made, both on the basis of its financial feasibility and on its obvious position as the environmentally superior alternative.

The Burton Mesa chaparral avoidance alternative would still make the project one of the largest in San Luis Obispo County in years. It also would still allow for 600 to 700 units to be built as part of the project. It also would keep intact the great majority of the oak woodland and Burton Mesa chaparral and would preserve 90% or more of the oaks on site. For these reasons this alternative should be considered the environmentally superior alternative and should be supported instead of the developer's proposal. **CNPS-39**

D. The DEIR does not adequately analyze the Residential Rural Development Alternative, rejecting it without substantial evidence (DEIR page 5-9)

This alternative would set aside 173 acres as residential rural land, with 49 acres of open space, and 22 acres dedicated to commercial. In view of the nature of the surrounding developed land as Rural Residential, it might be surmised that future development of the Dana Reserve would follow the same path and be considered by many to have been the most likely future for the land. However, the alternatives section in the DEIR does not attempt to review the entire parcel being zoned to Residential Rural, but just those portions that are intended for housing under the currently proposed project. The concept of clustering the lots is not considered. This appears to be just one of several different use configurations, but as the most likely potential for the site in the absence of the Dana Reserve would be Residential Rural for the entire parcel, this option should have been considered, along with the potential for clustering to protect habitat. Again, the argument about not meeting the "basic" project objective relating to providing a diversity of housing types, including affordable housing, comes up, and the alternative is eliminated. **CNPS-40**

E. The DEIR does not adequately analyze the Residential Rural Cluster Subdivision Alternative (Alternative 3)

We question the land area analysis presented under the analysis of Alternative 3. DEIR Section 5.4.4.1 notes that the cluster subdivision standards (LUO Section 22.22.140.B.) and the Subdivision Design Standards (LUO Section 22.22.060.) allow for 39 Rural Residential Parcels with an approximately 0.5-acre parcel size if sewer and water were to be provided, resulting in 40 acres of footprint on the 185 acres of the project land. The DEIR also states that a minimum parcel size of 2.5 acres would be required if water is not provided, totaling 97.5 acres for the 39 parcels. However, there is no analysis of the degree and location of clustering addressed in Alternative 3, where the infrastructure costs are considered a negative factor (*This alternative may preclude annexation into the NCSD due to infrastructure costs. If annexation into the NCSD does not occur, this alternative would rely on domestic water and sewer infrastructure and the minimum lot size would be 2.5 acres.*) If the clustering is restricted to the eastern end of the parcel, and is not distributed over much of the parcel, infrastructure costs would not be such a significant issue, and **CNPS-41**



the footprint would be limited to the 40 acres with no violation of the Conservation and Open Space Element of the General Plan.

The DEIR identifies this residential rural cluster alternative as the environmentally superior alternative. While it can be agreed that this alternative is superior to the proposed project, it is not environmentally superior to the Burton Mesa chaparral avoidance alternative, which has been questionably eliminated, and is therefore improperly identified. Alternative 3 could result in "edge effects;" a phenomenon well known to ecologists. This effect states that the edges of a habitat are more prone to degradation from outside than the interiors areas of such habitat. The non-native habitats of the housing complex, with their introduced plants (and weeds), and dogs and cats, can quickly invade neighboring undisturbed areas. Having clusters of such housing will increase the amount of "edge", thus making it easier for such intrusions to occur. This phenomenon has been observed again and again, and although such a development approach may leave more oak trees, it reduces the intrinsic value of the habitat and reduces that habitat to essentially its scenic character. It should be noted that this alternative is presented only in concept; much would depend on how and where the clusters were sited.

CNPS-41 (cont'd)

We therefore reject the selection of Alternative 3 as Environmentally Superior.

F. Alternative 4 also fails as the Environmentally Superior Alternative

The Burton Mesa chaparral avoidance alternative and Alternatives 2 and 4 result in the greatest amount of open space (205 acres, 173, and 183 acres, respectively) and thus preservation of biological resources. Alternative 4 would result in 1,100 units within 80 acres and is considered feasible (DEIR at 5-57). Alternative 4 is clearly better than the proposed project based on the increased acreage of protected oak woodland through a 15% decrease in housing and other land uses. However, the edge effects issue removes this alternative from consideration.

CNPS-42

We therefore conclude that a slightly revised Burton Mesa Chaparral avoidance alternative is the environmentally superior alternative, and that its rejection as infeasible is without substantial evidence.

G. Evaluate a Proposed Alternative to Reconcile the oft-stated Need for Affordable Housing found in the Alternatives Analysis of the DEIR while achieving Minimal Impacts to Natural Resources and minimizing inconsistencies with the General Plan

CNPS concurs that the DEIR shows that the Project and its Alternatives cannot minimize impacts to natural habitat to a degree that would be possible if the County's need for affordable housing were to be applied to this entire project. As noted above, CNPS, given a choice of alternatives, were it not for edge effects, would prefer Alternative 4, but we concur that this does not include sufficient affordable housing. We prefer the Burton Mesa Chaparral avoidance alternative, which has been inappropriately rejected. None of the Alternatives or the Proposed

CNPS-43

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Project sufficiently address the affordable housing crisis, despite being one of the largest housing projects proposed for the South County. We therefore strongly recommend a new alternative be considered: one that includes all units being built as affordable in a much smaller unit footprint, and that these units be concentrated at the eastern end of the project area. To best match developer objectives, as required by CEQA, we recommend that this new alternative be allowed as many residential units as originally planned but concentrated in a much smaller area by using multiple unit buildings. In this way impacts to the oaks and listed species, which are considered significant and unavoidable in the existing analysis, would be greatly reduced.

CNPS-43 (cont'd)

In summary, allowing insufficient mitigation and a gross violation of the General Plan by a developer is not in the best interests of the people in the County. As CEQA states that alternatives must, to a certain degree, meet the objectives of the developer, CNPS suggests that raising densities on a smaller footprint *does* meet a major objective, while also addressing a housing need that is insufficiently addressed by the current project.

CNPS-44

VIII. Conclusion

The Dana Reserve Specific Plan Project must be reduced in size. The project site contains unique resources that need not be traded for the development of housing. There are multiple significant and unavoidable (Class I) impacts of the project that should drive this reduction in size. This is one of, if not THE, largest project(s) in SLO County. There are numerous and vast inconsistencies with County policies, specifically the biological resource policies of the Conservation and Open Space Element of the General Plan. The alternatives analysis eliminates what we believe is a viable alternative. Given this, we believe the DEIR should be revised and recirculated to reflect that the Burton Mesa chaparral avoidance alternative is the environmentally superior alternative, and it must be analyzed along with other alternatives.

CNPS-45

Thank you for your consideration of these comments.

Sincerely,

Melissa Mooney
President
California Native Plant Society, San Luis Obispo Chapter

9.3.5.1 Response to Letter from California Native Plant Society

Comment No.	Response
CNPS-1	The comment raises concern related to the adequacy of the EIR and the size of the proposed project. Please refer to response to comments CNPS-2 through CNPS-45.
CNPS-2	The comment states that the DEIR does not include a clear statement of the underlying purpose of the project and states that several of the objectives are in conflict with Objective 9. Section 2.4 of the Project Description has been clarified to more clearly state the primary underlying purpose of the project, as described extensively throughout the EIR. Objective 9 has also been clarified to reflect the project's proposed permanent preservation of the large, centrally located, 17-acre oak *forest* as open space. This area has been characterized as "Coast live oak forest", rather than Coast live oak woodland, due to an oak canopy cover of greater than 50%. The oaks in the oak forest area are the most dense on the site, and would be preserved as open space under the Dana Reserve Specific Plan. The project is not in conflict with the stated objectives; impacts to special status plants and wildlife have been minimized to the extent feasible, while also still meeting the project's primary underlying purpose (to provide a range of housing types, including affordable housing and market-rate workforce housing).
CNPS-3	The comment states that the noted benefits to the County described under Section 2.4, *Project Objectives*, in Chapter 2, *Project Description*, of the EIR are questionable. Section 2.4 accurately summarizes the content of a Memorandum of Understanding the County Board of Supervisors entered into with the project applicant on January 26, 2021. As discussed in Chapter 2, *Project Description*, implementing the County's stated land use goals is a benefit of the project that has been identified by the County Board of Supervisors. The project's consistency with open space and biological resource policies is discussed in detail in Section 4.4, *Biological Resources*, and Section 4.11, *Land Use and Planning*. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CNPS-4	The comment states that the proposed open space easement is on steeper slopes and protects only 4% of the oak woodlands on site, and 3% of the Burton Mesa chaparral. Refer to response to comment CNPS-3 and Master Response MR-3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CNPS-5	The comment states that trading the unique biological resources of the Nipomo Mesa for a project that may not achieve affordable housing goals is not a benefit and is not supportable. As discussed in Chapter 2, *Project Description*, providing for affordable housing in furtherance of the County's Housing Element, affordable housing goals, and assisting in meeting the County's Regional Housing Needs Allocation is an applicant and County stated objective for the project. As discussed in Chapter 5, *Alternatives Analysis*, several alternatives have been identified and evaluated in an effort to reduce potentially significant impacts to biological resources. Ultimately, it will be the decision of the lead agency's decision-making body whether the project's economic, social, or other benefits outweigh the project's significant environmental effects. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CNPS-6	The comment states that the proposed conservation easement is not functional mitigation for the significant and unavoidable impacts of the project on oak trees, oak woodlands, and oak forest habitats and is not a benefit of the project. Refer to response to comments CNPS-3 and CNPS-5 and Master Response MR-3. As discussed in Chapter 2, *Project Description*, the off-site dedication of an off-site open space and conservation easement is proposed as a project design feature to minimize the impacts to oak trees and oak woodland as a result of development of the Specific Plan Area. This mitigation strategy relies on Public Resources Code 21083.4, which requires a County to mitigate for loss of oak woodlands by (1) conservation, (2) replanting, though this is limited to no more than 50%, and (3) payment into the Oak Woodlands Conservation Fund. So, clearly conservation is a viable mitigation option identified in state law. Mitigation Measure BIO/mm-15.1 further defines the requirements of the conservation easement that would apply to Dana Ridge. Impacts to coast live oak woodland, coast live oak forest, and individual oak trees are discussed in Section 4.4, *Biological Resources*, and mitigation has been identified, which would require mitigation through a combination of conservation, enhancement, restoration, and/or recreation. Additional mitigation for impacts to these resources include preparation and implementation of an on-site tree protection plan for trees retained, a tree replacement plan, protection of on-site oak woodland resources intended to be retained and

Comment No.	Response
	preserved on-site, and off-site preservation. These mitigation measures would reduce impacts associated with direct and indirect impacts to coast live oak woodland, coast live oak forest, and individual oak trees. However, County COSE Policy BR 1.4 set a policy for development projects to achieve "no-net loss" of sensitive habitat acreage, values, and function and County COSE Goal BR 3 is intended to maintain the acreage of native woodlands, forests, and trees at 2008 levels. However, County COSE Implementation Strategy BR 3.3.1 implements Public Resources Code Section 21083.4, which limits the amount of replanting that may be done to mitigate for loss of oak woodland to no more than 50% and points to conservation as a viable mitigation alternative. Impacts to oak woodland and oak forest would be mitigated through permanent conservation at Dana Ridge of oak woodland at a greater than 3:1 ratio and oak forest at a 2.5:1 ratio. Therefore, of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed from habitats other than oak woodland and oak forest. The applicant will also be required to plant approximately 1,500 new trees to mitigate indirect oak tree impacts. At this level, and even with the permanent off-site conservation of oak woodland at a greater than 3:1 ratio, this is a significant net loss of oak trees and acreage of oak woodlands in the county. Because no feasible mitigation was available to mitigate these impacts to less than significant, impacts were determined to be Class I, significant and unavoidable. The species composition of the coast live oak woodland in the project area contains the same species characteristic of the Burton Mesa chaparral vegetation community on-site. The understory vegetation on the mitigation parcel (Dana Ridge) is distinctly different and does not support the special-status species that occur on-site. That is because the soils and elevation range of the mitigation parcel (Dana Ridge) is significantly different than the Dana Reserve project area. Therefore, it was recognized in the EIR that Dana Ridge did not provide a comparable habitat matrix compared to that provided at Dana Reserve. The EIR also determined that mitigating for the removal of oak trees in Burton Mesa chaparral and grassland habitats with trees planted along streets and in recreational open spaces areas, as the on-site planting plan proposes, does not sufficiently maintain the integrity of the vegetation community being lost. Based on these considerations and the significant loss of oaks and oak woodlands, potential impacts were identified as significant and unavoidable (Class I). As discussed in Chapter 5, *Alternatives Analysis*, several alternatives have been identified and evaluated in an effort to reduce potentially significant impacts to biological resources. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.
CNPS-7	The comment states that allowing Burton Mesa chaparral mitigation outside SLO County, or even off the Nipomo Mesa, is inadequate mitigation. Refer to Master Response MR-3.
CNPS-8	The comment refers to Mitigation Measure BIO/mm-15.1 and accurately states that conservation of oak woodland is addressed in the context of the ecosystem in which it is found under this impact, rather than as an isolated species, and notes that locating suitable habitat may be impossible to either find or acquire. Refer to Master Response MR-3.
CNPS-9	The comment states that CNPS has for years had a policy of not recognizing off-site compensation as mitigation and states the Dana Ridge site is not appropriate for several reasons. Refer to Master Response MR-3 and response to CNPS-6. As discussed in Section 4.4, *Biological Resources*, a variety of mitigation measures has been identified for impacts on biological resources, including environmental monitoring; a worker environmental training program; covering excavations; erosion control; a public education program; prohibition of invasive plants; an incidental take permit; avoidance; preservation/restoration mitigation for rare plants; preconstruction surveys; special-status reptiles protection and relocation; nesting bird preconstruction surveys and nest avoidance; bat preconstruction surveys and passive relocation; badger den preconstruction survey and relocation; California red-legged frog, western pond turtle, and two-striped garter snake surveys and relocation; Conservation/enhancement/restoration for Burton Mesa chaparral; off-site mitigation for coast live oak woodland; delineation setbacks, timing constrains, and monitoring for riparian areas and aquatic habitats; an on-site tree protection plan for trees retained; a tree replacement plan; protection for on-site oak woodland resources; off-site preservation for oak woodlands; and oak tree monitoring. Impacts for which feasible mitigation was not sufficient to reduce the severity to less than significant have been classified as significant and unavoidable (Class I). As such, no changes to the environmental document are necessary in response to this comment.
CNPS-10	The comment objects to the use of an oak woodlands management plan as an instrument to avoid the intent of the County Oak Ordinance to conserve oak trees with the no-net-loss policy. Refer to Master Response MR-3 and response to CNPS-6.
CNPS-11	The comment suggests that the project should protect the existing oak woodland by designing a smaller project. Refer to Master Response MR-3. As discussed in Chapter 5, *Alternatives Analysis*, all of the alternatives evaluated would result in reduced impacts to oak trees compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes

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	to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CNPS-12	The comment states that the impacts to Pismo clarkia are significant and unavoidable (Class I) and requests clarity on the proposed area of disturbance around Collector B. Direct and indirect impacts on Pismo clarkia are considered significant and mitigation is required to reduce project impacts. The project applicant must obtain all necessary approvals and concurrence with the CDFW for the take of a state-listed plant. Mitigation shall be required to reduce project impacts through the permanent conservation of habitat occupied by Pismo clarkia and expansion of Pismo clarkia extent to mitigate for direct impacts. Additional on-site avoidance measures for Pismo clarkia include habitat protection, worker training, fencing, biological monitoring, weed management, and avoidance of mowing/grazing during the plant's annual growing season (February–July). No net loss of Pismo clarkia on-site would occur. The unavoidable impact to 0.02 acre of occupied Pismo clarkia habitat will be mitigated at a 3:1 ratio with on-site restoration and habitat enhancement to expand the extent of Pismo clarkia present in preserved open space. Mitigation Measures BIO/mm-2.1 through BIO/mm-2.3 are consistent with County COSE Policies BR 2.6.2 and BR 2.6.3 (Development Impacts to Listed Species), which include the use of a habitat preservation ratio of a minimum of 2:1 to avoid significant cumulative loss of valuable habitats and obtaining easements to protect habitat. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6 and BIO/mm-2.1 through BIO/mm-2.3, potential impacts to Pismo clarkia and their habitat would be less than significant with mitigation (Class II). Detailed design of Collector B has not been completed at this phase of the project; the typical width for Collector B is shown in Figure 2-15 in Chapter 2, *Project Description*. No changes to the environmental document are necessary in response to this comment.
CNPS-13	The comment raises concern related to the protection of Mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita. As discussed in Section 4.4, *Biological Resources*, approximately 7,553 mesa horkelia rosettes were detected across the project area during the 2017 to 2020 surveys, predominantly within or near coast live oak woodland. Plants were frequently encountered along the dripline of oak tree canopy (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Approximately 50 Nipomo Mesa ceanothus shrubs were detected during the 2017 to 2020 surveys (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Individuals predominantly occur in the northeastern portion of the project area, and many are less than 4 feet tall. Sandy soil in the project area's chaparral and woodland habitats is highly suitable for this species. A portion of a known record (CNDDB #16) of sand mesa manzanita occurs in the project area. Within the project area, 324 sand mesa manzanitas were detected during the 2017 to 2020 surveys (see Figures 4.4-3 and 4.4-4; EIR Appendix E). Individuals are scattered across the project area and the majority are less than 2 feet tall. Stumps appear to have been previously burned or masticated and are regenerating from underground root burls. No changes to the environmental document are necessary in response to this comment.
CNPS-14	The comment states that the project is inconsistent with the General Plan's Goal BR-1 in the Conservation and Open Space Element and raises concern regarding overwintering and nesting habitat associated with loss of oak trees at the site. As discussed in Section 4.4, *Biological Resources*, the project would be potentially inconsistent with Goal BR 1. The project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. Therefore, the impact determination in the EIR is consistent with the intent of this comment. The project's potential impacts on nesting birds, including birds protected under the Migratory Bird Treaty Act, are evaluated under BIO Impact 7. BIO Impact 7 evaluates the loss of nesting and foraging habitat in oak, chaparral, and grassland habitats. This impact would be reduced to less than significant through implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4. No changes to the environmental document are necessary in response to this comment. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects.
CNPS-15	The comment asserts that impacts to nesting birds are significant and unavoidable. As discussed in Section 4.4, *Biological Resources*, impacts to special-status birds, raptors, and nesting birds would be less than significant with implementation of Mitigation Measures Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4. Mitigation Measure BIO/mm-7.1 would require nesting bird preconstruction surveys and nest avoidance to ensure direct impacts to nesting birds are avoided. No changes to the environmental document are necessary in response to this comment.
CNPS-16	The comment asserts that impacts to American badger are also significant and unavoidable.

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	American badger occurs in the project area. Project activities, including grading and other excavation work, could result in impacts to American badger adults or young or disturbance of natal dens and abandonment by adult badgers. During the winter, badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys are required to be conducted for badger dens throughout the year. With implementation of Mitigation Measures BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4, impacts to American badger would be less than significant with mitigation (Class II). No changes to the environmental document are necessary in response to this comment.
CNPS-17	The comment states that the DEIR fails to address the project's dependence on water imported by Nipomo Community Services District which should otherwise have been used to counter continued decline of groundwater storage in the area. Refer to Master Response MR-1.
CNPS-18	The comment states it is extremely unlikely the Southland Wastewater Treatment Facility will recharge the production aquifers beneath the Mesa, and more likely returning the water to the Santa Maria area. Refer to Master Response MR-1.
CNPS-19	The comment raises concern related to groundwater recharge and states the conclusion of "potentially consistent" cannot be made for General Plan Policy BR 4.1. Refer to Master Response MR-1. Ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans and policies. Therefore, the EIR preparers completed a consistency analysis of the proposed project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent). It should also be noted that perfect conformity with every general plan policy is neither achievable or required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-*1342). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear. As shown in the preliminary grading scheme for the site, there are four proposed 8-foot maximum ponded depth stormwater basins located at the northeast, southwest, and west/northwest corners of the Specific Plan Area. In addition, multiple shallow, 2-foot maximum ponded depth stormwater basins are proposed throughout the eastern half of the Specific Plan Area. All stormwater basins would be designed to meet County Public Improvement Standards. Each subsystem of basins would be sized to accommodate the remaining runoff produced by the additional impervious areas within each respective drainage management area and neighborhood development. Storm drain inlets/culverts would also be added to connect subsystems of basins where appropriate. Overflow structures, culverts, weirs, or other devices would be added and sized to meet discharge flows for both the County requirements and Central Coast Regional Water Quality Control Board (RWQCB) post-construction stormwater requirements. Each development area within the Specific Plan Area would be responsible for designing and incorporating its own stormwater treatment infrastructure within the individual DRSP neighborhoods and/or commercial area. Stormwater treatment options to be utilized within the Specific Plan Area are found in Appendix A (see Appendix A of this EIR). The project would include LID and SWPPP requirements to protect streams and riparian vegetation at the location of off-site improvements; therefore, the project is considered to be potentially consistent with the intent of Policy BR 4.1. No changes to the environmental document are necessary in response to this comment.
CNPS-20	The comment raises concern related to pollutant release and states that the conclusion of "Potentially Consistent" for General Plan Policy BR 4.4 is speculative. Refer to Master Response MR-1 and CNPS-19. The project would include County and RWQCB required LID and SWPPP requirements to reduce nonpoint source pollution at the location of off-site improvements; therefore, the project is considered to be potentially consistent with the intent of Policy BR 4.4. No changes to the environmental document are necessary in response to this comment.
CNPS-21	The comment raises concern related to groundwater recharge and suggests the project is inconsistent with General Plan Policy SL 2.1. Refer to Master Response MR-1 and CNPS-19. The intent of Policy SL 2.1 is to protect watersheds, aquifer-recharge areas, and natural drainage systems. Future development within the Specific Plan would be required to prepare and submit a drainage plan, which would direct stormwater into the proposed on-site storm drain systems and prevent off-site runoff. Implementation of the drainage plan would ensure that stormwater runoff is controlled within each development area, consistent with this policy. No changes to the environmental document are necessary in response to this comment.
CNPS-22	The comment suggests the project is inconsistent with General Plan Policy WR 1.9. Refer to Master Response MR-1 and CNPS-19. The intent of General Plan Policy WR 1.9 is to promote infill development, discourage urban sprawl, and conserve water resources. The project would be annexed into the NCSD service area to facilitate NCSD's

Comment No.	Response
	provision of water and wastewater services. The project would not create new mutual or private water companies. No changes to the environmental document are necessary in response to this comment.
CNPS-23	The comment suggests the project is inconsistent with General Plan Policy WR 1.13. Refer to Master Response MR-1 and CNPS-19.
CNPS-24	The comment raises concern related to groundwater resources and suggests the project is inconsistent with General Plan Policy WR 1.14. Refer to Master Response MR-1 and CNPS-19.
CNPS-25	The comment suggests the project is inconsistent with General Plan Policy WR 3.3. Refer to Master Response MR-1 and CNPS-19. The project would include County and RWQCB required LID and SWPPP requirements to reduce nonpoint source pollution at the location of off-site improvements. Future development within the Specific Plan would be required to comply with applicable requirements of the project-specific SWPPP, PCR 2, and operational source control BMPs (as applicable) to detain, retain, and treat polluted stormwater runoff; therefore, the project is considered to be potentially consistent with the intent of Policy WR 3.3. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CNPS-26	The comment raises concern related to groundwater recharge and consistency with relevant policies. Refer to Master Response MR-1 and response to comments CNPS-19 through CNPS-25.
CNPS-27	The comment summarizes the significant and unavoidable (Class I) impacts identified in the DEIR for air quality, cumulative air quality, greenhouse gas emissions, and transportation. No changes to the environmental document are necessary in response to this comment.
CNPS-28	The comment states that the project would be inconsistent with Goal BR 1; Policies BR 1.2, 2.4, 1.9, and 2.6; Goal BR 3, Policies 3.1, 3.2, and 3.3; visual resources Goal 2, and Policies VR 2.1 and 2.2 and concurs with the findings of the DEIR. No changes to the environmental document are necessary in response to this comment. It should be noted that perfect conformity with every general plan policy is neither achievable or required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341-*1342). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear.
CNPS-29	The comment states agreement with the findings in the DEIR related to the project's potential inconsistency with Framework for Planning (Inland) Principles 1 and 2 and Policies 1 and 2. The comment also identifies an inconsistency in impact determinations identified for LUP Impact 7 in Section 4.11, *Land Use and Planning*, and states they believe LUP Impact 7 is a Class I impact. Refer to response to CNPS-19. LUP Impact 7 identifies a Class II significant but mitigable impact related to potential inconsistencies with policies for the protection of existing character and visual resources, and substantial evidence regarding the character and visibility of the site is provided to support a Class II significant but mitigable impact determination as is reflected in the discussion under LUP Impact 7 and residual impact analysis. The typo in the heading of LUP Impact 7 has been corrected to reflect a Class II impact, consistent with the analysis in that section and the *Executive Summary*. Ultimately, it will be the decision of the lead agency's decision-making body (i) whether the project is consistent with various open space and biological resource policies, (ii) whether the project is consistent with the General Plan as a whole (including its land use goals), and (iii) whether the project's economic, social, or other benefits outweigh the project's significant environmental effects.
CNPS-30	The comment states that the project would be inconsistent with County of San Luis Obispo Land Use Ordinance 22.10.095 Highway Corridor Design Standards. Refer to response to comment CNPS-19. This is consistent with the finding in Section 4.11, *Land Use and Planning*. No changes to the environmental document are necessary in response to this comment.
CNPS-31	The comment states that the project would be inconsistent with the policies included in the South County Inland Area Plan related to retaining open space. Refer to response to comment CNPS-19. As discussed in Table 4.11-4 (Policies for which the Project would be Potentially inconsistent With) of Section 4.11, *Land Use and Planning*, the proposed project is considered to be potentially inconsistent with this guideline. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of approximately 3,943 mature oak trees; and substantial sensitive habitat loss and landform alteration. However, the project includes proposed legislative actions that would eliminate inconsistencies with the South County Area Plan. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
CNPS-32	The comment agrees with the conclusion in the DEIR that "cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character would be significant and unavoidable." Refer to response to comment CNPS-19. No changes in the environmental document are necessary in response to this comment.
CNPS-33	The comment challenges several "potentially consistent" determinations in the policy consistency section. Each of the policy impact determinations is substantiated with substantial evidence to support the preliminary impact determination. Refer to response to comment CNPS-19.
CNPS-34	The comment summarizes the alternatives analyzed in Chapter 5, *Alternatives Analysis*, and asserts that the rejected Burton Mesa chaparral avoidance alternative is the environmentally superior alternative. Refer to Master Response MR-3 and response to comment NCSD-52. As discussed in Chapter 5, under the Burton Mesa chaparral avoidance alternative, the project would not provide a diversity of housing types, including affordable homes, and would not connect on-site residential neighborhoods to the community through development of pedestrian, bicycle, and equestrian trails via Collector B and an on-site trail system in the majority of the Specific Plan Area. Therefore, the Burton Mesa chaparral avoidance alternative would not meet most of the basic project objectives. This alternative would also likely be infeasible from a cost perspective. Based on the substantially reduced project footprint, increased density, and more compact design, the Burton Mesa chaparral avoidance alternative would accommodate an increased number of multi-family units and a decrease in single-family units compared to the proposed project. Single-family units would be reduced from 831 to 111 and multi-family units would be increased from 458 units to 704 units. This does not meet the basic project objective of providing a range of housing types, including affordable housing and market-rate workforce housing. Further, the reduced number of units and utility connections makes expansion of NCSD and roadway infrastructure to serve the site more expensive per unit, decreasing the feasibility of a multi-family residentially focused alternative being feasible and increasing the challenges of providing affordable housing within the Specific Plan Area. Since this alternative does not meet the basic project objectives, is likely infeasible, and has the potential to generate new potentially significant impacts, this alternative was eliminated, consistent with State CEQA Guidelines Section 15126.6(c). No changes to the environmental document are necessary in response to this comment.
CNPS-35	The comment states that the alternatives presented fail to optimize for affordable housing while maximizing conservation of oak woodlands. Refer to Master Response MR-3. Refer to the discussion under Section 5.4.5 of the EIR, which evaluated Alternative 3: Residential Rural Cluster Subdivision and Alternative 4: Development on Non-Native Grassland, both of which would reduce impacts on oak woodlands. No changes to the environmental document are necessary in response to this comment.
CNPS-36	The comment states the analysis of alternatives fails to impartially determine whether a particular alternative meets or doesn't meet the project objectives. Section 2.4 of the Project Description has been clarified to more clearly state the primary underlying purpose of the project, as described extensively throughout the EIR. The Alternatives Analysis evaluated a range of feasible alternatives, but only those that met the project's primary underlying purpose (to provide a range of housing types, including affordable housing and market-rate workforce housing) were evaluated in detail.
CNPS-37	The comment states that the DEIR does not adequately analyze the Burton Mesa chaparral avoidance alternative and rejects the alternative without providing substantial evidence of infeasibility. As described in Section 5.3.1 of the EIR, due to the substantially reduced number of units under the Burton Mesa Chaparral Avoidance Alternative, the expansion of NCSD water and wastewater infrastructure, as well as transportation and utility infrastructure, would be cost prohibitive. This would be true of a housing project with no affordability goals and is more severely true of the proposed project, the primary objective of which is to provide a range of housing, including affordable and market-rate workforce housing. No changes to the environmental document are necessary in response to this comment.
CNPS-38	The comment suggests that the Burton Mesa chaparral avoidance alternative could achieve all 13 of the stated project objectives. Refer to responses to comments CNPS-34 through CNPS-37, above. Development at the level that would be allowed under the Burton Mesa Chaparral Avoidance Alternative would not meet the project's goals for affordable housing, both deed-restricted affordable housing and market-rate workforce housing. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

Comment No.	Response
CNPS-39	The comment states that no substantial evidence is provided to show why the Burton Mesa chaparral avoidance alternative is not feasible and requests that more detailed analysis of this alternative be made. Refer to responses to comments CNPS-34 through CNPS-38, above.
CNPS-40	The comment states the DEIR does not adequately analyze the Residential Rural Development Alternative. Refer to responses to comments CNPS-34 through CNPS-38, above. Like the Burton Mesa Chaparral Avoidance Alternative, the Residential Rural Development Alternative was determined to be inconsistent with the project's basic underlying purpose, which is to provide a range of housing, including affordable housing and market-rate workforce housing. A Residential Rural Cluster Subdivision Alternative was evaluated as Alternative 3 in the EIR, and ultimately determined to be the Environmentally Superior Alternative.
CNPS-41	The comment advocates for the Burton Mesa Chaparral Avoidance Alternative, consistent with prior comments and states the DEIR does not adequately analyze the Residential Rural Cluster Subdivision Alternative. Refer to responses to comments CNPS-34 through CNPS-40, above. The analysis of Alternative 3: Residential Rural Cluster Subdivision assumes this alternative has the potential to facilitate a two- to 10-lot cluster subdivision on each 5-acre Residential Rural (RR) parcel, resulting in the construction of 78 to 390 single-family residential units, in addition to a proportionate number of ADUs. As described in the EIR, while the number and extent of needed improvements may be reduced due to this alternative's reduced demand for services and the location of clustered development, the cost of implementing the needed infrastructure improvements would be very high to serve a relatively low number of units and uses. Assuming it is feasible to construct, it would not provide a mix of housing types and affordability levels at the same level as the proposed project.
CNPS-42	The comment states Alternative 4 also fails as the Environmentally Superior Alternative and concludes that a slightly revised Burton Mesa Chaparral avoidance alternative should be the environmentally superior alternative. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-43	The comment advocates for a proposed alternative to reconcile the oft-stated need for affordable housing while achieving minimal impacts to natural resources and minimizing inconsistencies with the General Plan by proposing 100% affordable units in the eastern portion of the site. This alternative is similar to Alternative 4: Development in Non-Native Grassland, which primarily exists on the eastern portion of the site. Development on grassland in the western portion of the site would be infeasible due to the cost of expanding water, wastewater, and transportation infrastructure to serve the more limited areas of non-native grassland. A 100% affordable project would not generate the revenue needed to facilitate construction of necessary transportation, water, or wastewater infrastructure to serve the site. Collectors A and B each have an associated cost over $10 million to construct. NCSD connection fees for the project are estimated at $40 million. These fees would presumably be reduced with a reduced project but cost of construction the facilities needed to serve development would not. These costs would be proportionately increased across the fewer number of units. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-44	The comment advocates for a higher density project with a smaller footprint, consistent with Alternatives 3 and 4 in the EIR. Refer to responses to comments CNPS-34 through CNPS-41, above.
CNPS-45	The comment summarizes and restates previous comments. Refer to responses to comments CNPS-34 through CNPS-41, above.

9.3.6 Nipomo Native Garden



Nipomo Native Garden

July 30, 2022

To the County Planning Department
Re: The Dana Reserve Development

As president of the board for the Nipomo Native Garden, I feel compelled to respond to the EIR for the Dana Reserve Development. Our organization has spent 30 years trying to maintain and develop 12 acres of county park land with the exact habitat that is going to be destroyed by this project. I am not a biologist so I will leave the technical aspects of habitat destruction to the California Native Plant Society. But some of my concerns are these:

HABITAT
The Burton Mesa Chaparral plant community is very rare, being found only in northern Santa Barbara and southern San Luis Obispo counties. There used to be a lot more acres of it before the development of the last phase of Black Lake Golf Course. The corner of Willow Rd and Pomeroy used to be called Ceanothus corner back then because of the beautiful spring display of Ceanothus impressus v. nipomoensis. As noted in the EIR, the plants in this community are finicky as to their living requirements. They have specialized niches that they inhabit. You can't just transplant them any old place and expect them to survive. And they are interesting and important plants to native wildlife.

-The EIR admits that there is no way to preserve this habitat in any decent way with the size and scope of this project. So the band-aid approach is recommended: Use California Live Oak trees for street trees and visual barriers. Don't worry about trying to preserve much of the Burton Chaparral because they are plants that are rejuvenated by fire and we can't really do controlled burns in such a densely planted neighborhood. Instead, the mitigation site will be off on some remote property far away from the main part of Nipomo where many of these plants will not survive since the area they will be planted in will not meet their finicky requirements. This does not seem like the best way to preserve this delicate ecosystem.

NNG-1

RURAL CHARACTER OF NIPOM0
One of the goals of this project (supposedly) is to retain the rural character of Nipomo. But the main indicator of our "rural character" seems to be whether or not you have a view of the Temetatte Range. Plunking 1200 housing units right on the edge of the urban reserve line seems like a guaranteed way to destroy the rural character of our community. There are many

NNG-2

smaller in-fill projects that could be built around the area that would not have such a huge visual impact.

NNG-2 (cont'd)

TRAFFIC CIRCULATION

If you live in Nipomo, you know that the Tefft St. corridor is the center of the community. Most of the services available are on this street or right off it. It is extremely congested at certain times of the day with solid lines of traffic moving slowly in both directions. In addition, Hwy 101 during the late afternoon backs up almost to Los Berros and moves very slowly to and through the Tefft St interchange. There never seems to be any particular reason---no accidents, etc---- there are just too many cars trying to navigate the two-lane highway. Now think of 1200 more houses feeding into this area, built right against the urban reserve line and the freeway. Traffic will be at a standstill for certain times of the day. The quality of life for everyone will diminish significantly. Is this what passes for urban planning these days?

NNG-3

WATER

This project is touted as being a win-win since it will lower the water bills for the people who are serviced by the NCSD since they contracted with Santa Maria to buy a certain amount of water each year. However, the extra water that Santa Maria has is primarily from the State Water Project which people have advertised as a reliable source of water. But as we have seen this year, when drought hits all parts of California, there is not enough water to go around. We do not know how long this drought will last or whether we will ever get back to average rainfalls in the near future. But it seems unwise to depend on a source that already announced that it was having trouble supplying all of its customers.

When the NCSD decided to get supplemental water from Santa Maria (after the people of Nipomo had voted it down twice!!), it was sold to the community as a way to replenish our over-drafted aquafer. The NCDS said that the water would only be used for this purpose and that it wouldn't result in more large-scale development in Nipomo. Yet here we are with everyone gung-ho to do just that. What happens if the drought lasts another 10 years? Where will we be then?

NNG-4

PLANNED COMMUNITY CONCEPT

When the 1200 house project at Trilogy was approved, everyone was excited by the idea that it would be a self-sustaining community with its own services, jobs and a school. More additional houses keep being built at Trilogy and none of these amenities happened. The school got ditched first. The business park never took off, and even though the commercial area has signs requesting businesses to develop there, the only thing that has happened so far, after all these years, is a Dignity Health blood drawing facility. Everyone who lives there has to go to the Tefft Street corridor, or into Santa Maria or Arroyo Grande to do their errands. Will the same thing happen with the Dana Reserve? Why have these closed off private communities? Wouldn't it be better to have smaller projects spread out over the whole community so that no one area has to bear the burden of increased density and traffic?

NNG-5

CONCLUSION

I know that there is a need for more workforce housing. It is appalling to me how the price of housing has escalated in the last 10 years. But are these large-scale developments the only way

NNG-6

to get some more reasonable units? Is there a way to work with People's Self-Help Housing or other organizations to develop projects that are only work-force housing and not this attempt to do everything in one big-scale project? Could ADU's play a larger role in developing additional units if some of the onerous costs and requirements where lessened?

NNG-6 (cont'd)

I know that those of you in the planning community have a much better understanding than I do of the issues. But I do know that this project is going to irrevocably change the character and feel of Nipomo, and not in a good way. It will also lead inevitably to more large- scale development.

NNG-7

Please consider carefully the full impacts of this development and do not approve it as it is currently configured.

Sincerely,

Cynthia Jelinek
President, Nipomo Native Garden

9.3.6.1 Response to Letter from Nipomo Native Garden

Comment No.	Response
NNG-1	The comment states the off-site mitigation property does not seem like the best way to preserve the delicate ecosystem of Burton Mesa chaparral. Refer to Master Response MR-3. As discussed under BIO Impact 14 in Section 4.4, *Biological Resources*, both on-site and off-site mitigation opportunities were evaluated to reduce potential impacts to Burton Mesa chaparral. Under the current project design, on-site mitigation opportunities are limited. In addition, Burton Mesa chaparral is a fire prone and fire dependent natural community, achieving its highest species diversity following fires (CDFG 2007). Unfortunately, incorporating fire, in the form of controlled burns, as a habitat management tool to maintain species diversity is challenging in an urban setting. Given this management constraint, off-site conservation of Burton Mesa chaparral would be the best option to offset significant impacts. However, due to the limited range of this vegetation type and the limited availability of off-site mitigation parcels, implementing off-site mitigation may also not be feasible. Due to the lack of off-site mitigation opportunities, the applicant has reevaluated potential on-site mitigation options. One proposed plan would reestablish small patches of Burton Mesa chaparral in native gardens around the periphery of the proposed development (See EIR Appendix E). These smaller isolated patches would not provide the same habitat value as what is currently on-site, even when considering the degraded nature of the natural community. This is because it is the combined habitat matrix of Burton Mesa chaparral, coast live oak woodland, and California perennial grassland that supports the special-status plant and wildlife species that are present. If plants established in native gardens are propagated from material and seed salvaged on site, then they would be beneficial in maintaining the genetic diversity of the rare plant species that comprise the constituent elements of Burton Mesa chaparral. Because offsite mitigation parcels are currently unavailable and on-site mitigation options do not provide the same habitat value as the habitat being removed, potential impacts would be significant and unavoidable. Several alternatives were evaluated in Chapter 5, *Alternatives Analysis*, which would include reduced footprints and would result in reduced impacts to Burton Mesa chaparral compared to the proposed project. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
NNG-2	The comment states that the project will destroy the rural character of the community. As discussed in Section 4.1, *Aesthetics*, the Temettate Ridge approximately 3 miles east of US 101 is visually dominant and provides a high-quality scenic backdrop for much of the community. The County's COSE identifies the Temettate Ridge east of Nipomo and US 101 between Arroyo Grande and State Route (SR) 166 as “Areas Subject to Scenic Protection Standards.” The visual analysis included in Section 4.1 was prepared by a landscape architect and concluded that implementation of the DRSP project would have little to no effect on existing public views of the Temettate Ridge and the scenic vista to the east. Because of the extensive mature tree cover and topography throughout the northern, southern, and western portions of the site, many of the potential views to the eastern hills are already substantially blocked as seen from adjacent streets and neighborhoods. Due to view angle and elevation, views to the Temettate Ridge from Nipomo Community Park south of the Specific Plan Area would not be affected by implementation of the proposed project. As seen from important commercial corridors, such as US 101, Tefft Street, and North and South Frontage Roads, views of the scenic hills to the east would not be affected since the project site is oriented in the opposite viewing direction, generally to the west. Within the project site itself, the existing oak-covered ridge contributes to the scenic vista as seen from much of the surrounding area. The Specific Plan proposes to save that landform and associated trees, which would preserve the ridge’s benefit as part of the scenic vista. Although portions of the Specific Plan Area would be visible from areas in and around the community, the development would not visually encroach onto the most scenic, character-defining elements of the scenic backdrop to the east. From many viewpoints, due primarily to viewing distance and the associated view angle, even the larger and more dense part of the development would not block views of the Temettate Ridge to the east. From many locations, where visible, buildout per the proposed Specific Plan would be visually subordinate to the overall scenic quality of the hillside community backdrop. Although the Specific Plan Area is planned for development in the County’s existing General Plan, and the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of approximately 3,943 mature oak trees; and substantial sensitive habitat loss and landform alteration. Mitigation Measure AES/mm-3.1 would require a visual screening zone to be established along the length of the project adjacent to the utility easement and US 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
NNG-3	The comment raises concern related to an increase in traffic along the Tefft Street corridor and US 101, which already experience daily congestion. As discussed in Section 4.17, *Transportation*, buildout of the DRSP would require the payment of development fees by each prospective developer, including fair-share contributions, for identified off-site transportation improvements at the Tefft Street/US 101 interchange and North Frontage Road. The County's existing Road Improvement Fee Ordinance No. 2379 (1988) allows the County to collect fees to fund road construction projects that are needed to mitigate cumulative traffic impacts. Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed VMT thresholds. With implementation of feasible mitigation measures, including Mitigation Measure TR/mm-3.1, VMT impacts of the phased buildout of the Specific Plan Area would remain significant and unavoidable with mitigation (Class I). No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
NNG-4	The comment raises concern related to the reliability of the State Water Project and the NCSD water supply. Refer to Master Response MR-1.
NNG-5	The comment refers to the Trilogy project and the project features that haven't been developed and suggests that smaller projects throughout the community could be more beneficial than the proposed project. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the approximately 288-acre Specific Plan Area. The DRSP would also provide a phasing/implementation plan and describe the public facility financing mechanisms available for the ongoing maintenance of public and private improvements required for the DRSP. The DRSP includes a preliminary phasing plan that identifies three phases for initial site preparation and infrastructure establishment, as shown on Figure 2-24 and described in Chapter 2, *Project Description*. Infrastructure for Phase 1, which includes the Flex Commercial and Village Commercial areas, would be built out first. The identified phasing represents a reasonable approach to extending services and infrastructure throughout the Specific Plan Area. In some cases, property owners may wish to develop in phases concurrently or in a different order than anticipated in Figure 2-24. This would be permitted, provided that all public improvements needed to support proposed development are completed, circulation is provided for secondary access, and the change in phased development would not require additional environmental review. No changes to the environmental document are necessary in response to this comment.
NNG-6	The comment suggests developing projects that are only work-force housing and increasing the role of ADUs in developing additional units. A reduced project would not generate the revenue needed to facilitate construction of necessary transportation, water, or wastewater infrastructure to serve the site. Collectors A and B each have an associated cost over $10 million to construct. NCSD connection fees for the project are estimated at $40 million. These fees would presumably be reduced with a reduced project but cost of construction the facilities needed to serve development would not. These costs would be proportionately increased across the fewer number of units. Refer to responses to comments CNPS-34 through CNPS-41, above.
NNG-7	The comment raises concern related to neighborhood compatibility and requests that the decision-making body deny the project as it is currently configured. Refer to response to comment NNG-2. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.3.7 Californians for Homeownership

CALIFORNIANS FOR HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

August 1, 2022

VIA EMAIL

Jennifer Guetschow
County of San Luis Obispo
976 Osos Street, Room 300
San Luis Obispo, CA 93408
Email: jguetschow@co.slo.ca.us

RE: Dana Reserve Specific Plan DEIR

Dear Ms. Guetschow:

We appreciate the opportunity to provide comments regarding the Draft Environmental Impact Report on the Dana Reserve Specific Plan. Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools and the courts to address California's housing crisis. We are writing in support of the County's efforts to address the housing crisis by facilitating the development of housing within its borders—an effort that will be furthered by its approval of the Dana Reserve Specific Plan.

For several decades, California has experienced a significant housing access and affordability crisis. In recent years, this crisis has reached historic proportions. As a result of the housing affordability crisis, younger Californians are being denied the opportunities for homeownership and housing security that were afforded to previous generations. Many middle and lower income families devote more than half of their take-home pay to rent, leaving little money to pay for transportation, food, healthcare, and other necessities. Unable to set aside money for savings, these families are denied the opportunity to become homeowners, and are at grave risk of losing their housing in the event of a medical issue, car trouble, or other personal emergency. Indeed, housing insecurity in California has led to a mounting homelessness crisis. And the crisis has had a disproportionately harmful effect on historically disadvantaged communities, including individuals with physical and developmental disabilities and communities of color.

At the core of California's housing crisis is its failure to build enough new housing to meet the needs of its growing population. The Legislative Analyst's Office estimates that, from 1980 to 2010, the state should have been building approximately 210,000 units a year in major metropolitan areas to meet housing demand. Instead, it built approximately 120,000 units per year during that period. And the situation is getting worse: in the five-year period from 2013 to 2017 California issued building permits for less than half as many units as it did in 1985-1989. Today, California ranks 49th out of the 50 states in existing housing units per capita.

CFH-1

525 S. Virgil Avenue
Los Angeles, CA 90020

The Legislature has recognized that the housing crisis is an emergency that requires proactive solutions: "The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state's environmental and climate objectives." Gov. Code § 65589.5(a)(2)(A).

This project will provide much-needed housing in a variety of housing types and levels of affordability. Approval of the Specific Plan is well-supported by the record, and the County's environmental review has met the requirements of the California Environmental Quality Act (CEQA).

CFH-1 (cont'd)

Sincerely,



Matthew Gelfand

9.3.7.1 Response to Letter from Californians for Homeownership

Comment No.	Response
CFH-1	The comment expresses support for the proposed project and states that the project will provide much-needed housing in a variety of housing types and levels of affordability. No changes to the environmental document are necessary in response to this comment.

9.3.8 Coalition of Labor Agriculture & Business of San Luis Obispo County

COLAB
San Luis Obispo County
The Coalition of Labor Agriculture and Business

Department of Planning and Building **August 1, 2022**

ATTN: Dana Reserve/Jennifer Guetschow

976 Osos Street, Room 300

San Luis Obispo, CA 93408

By Email

From Michael F. Brown Government Affairs Director
colabslo.@gmail.com

805 944-4274

Dana Reserve

Dana Reserve Specific Plan Environmental Impact Report
Chapter 2 Project Description



Figure 2-9. DRSP Proposed Conceptual Master Development Plan.

1

The DEIR fails on many grounds including but not limited to:

Context

Science

Fairness

Perspective

Logic

In the end and like most EIRs, it is a compartmentalized, systematic exploitation of the obvious designed to discourage future progress.

Some of these failures are detailed below. However before considering the detail, please read the section immediately below, which provides essential overall context which the DEIR completely ignores.

Table 4-1. Summary of Environmental Impacts Analysis

Environmental Resource	Significant, Unavoidable Adverse Impacts	Significant, but Mitigable Impacts	Less than Significant Impacts
Aesthetics		X	
Agriculture and Forestry Resources		X	
Air Quality	X		
Biological Resources	X		
Cultural Resources		X	
Energy		X	
Geology and Soils		X	
Greenhouse Gas Emissions	X		
Hazards and Hazardous Materials		X	
Hydrology and Water Quality		X	
Land Use and Planning	X		
Mineral Resources			X
Noise		X	
Population and Housing	X		
Public Services		X	
Recreation		X	
Transportation	X		
Tribal Cultural Resources		X	
Utilities and Service Systems		X	
Wildfire		X	

COLAB-1

2

The Draft Dana Reserve Environmental Impact Report (DEIR) finds CEQA Class I unmitagatable impacts for 6 of the Environmental Resource criteria. These include Air Quality, Biological Resources, Greenhouse Gas Emissions, Population and Housing, and Transportation.

The combined findings would forbid decision makers from approving the project, except that CEQA provides that project alternatives can be considered if the project cannot be moved to a different location. In this case the developer does not own an alternative site where the project could be located.

COLAB-1 (cont'd)

More blatantly, it ignores the fact that there is no site in the unincorporated county owned by a private person on which the 288 acre project could be located. The County's Housing Element inventory of existing sites demonstrates this fact conclusively. See pages in section 7 - (8) - 7-(20) of the Housing element for the detail. The data for the categories is summarized below.

Very Low and Low

Assessor's Parcel Number	Community	General Plan Designation and Zone	Acres	Maximum Allowable Density (units/ac)	Maximum Potential Units Per General Plan	Realistic Potential Units (18 units/ac)	Affordability Category	Water Capacity (Y/N?)	Sewer Capacity (Y/N?)	Electrical Service Available (Y/N?)	Internet Service Available (Y/N?)
017-322-016	Shandon	CR	2.31	38	88	41	Lower	Yes	Yes	Yes	Yes
TOTALS			**81.96**		**3,114**	**1,459**					

Moderate

Totals			**57.8**		**2,003**	**975**					

COLAB-2

Note that only a total of 139.8 acres are zoned for low and moderate in the entire unincorporated area. The Dana reserve at 288 acres exceeds this amount.

Above Moderate

Totals			**194.39**		**1,205**	**821**					

Only 194.4 acres are zoned for above moderate (everything else). Even when above moderate is added in, there are only 333.8 acres zoned in the entire unincorporated County for homes.

The County's scheme of land use provides no substantial opportunity to develop large numbers of homes with economies of scale on any basis. The fact that it has a State approved Housing Element is simply window dressing and a result of the narrow and incomplete State criteria for achieving approved housing elements.

Basically, the County's scheme of land use is destined to preserve and promote large lot and estate type development of homes in excess of $1 million or more in price for high income/high net worth whites seeking a rural or semi-rural lifestyle. It is patently discriminatory and is particularly abusive of Hispanic families, black families, agricultural workers who are largely

COLAB-3

3

Hispanic, aging persons on fixed incomes, single mothers, homeless people, and young people seeking to form a family household.

Moreover, it seeks to concentrate low and moderate income people in dense development within the corporate cities and unincorporated URLs. Here, the County is again concentrating low and moderate income people (many of whom are Hispanic, Black, Native American) into dense zones. All this is camouflaged under the rubric of fighting global warming and promoting "efficient" development.

In turn, and because where you live has everything to do with your chances in life, the lower income people are condemned to the worst schools, highest tax and fee jurisdictions, crime, cannabis dispensaries, traffic noise (scary sirens and public transit buses roaring down the streets), homeless encampments, and all the rest.

Please see the article Addendum I to this EIR response at the end for further information.

COLAB-3 (cont'd)

The California Environmental Quality Act (CEQA)

In the case of the Dana Reserve Project and many other projects, CEQA is abused by local planners, decision makers, and intervenors to aid and abet the social and racial concentration of the poor into dense urban areas with older and often deteriorated housing. In turn, this insulates the upper middle and upper income whites from the negative urban living problems of crime, drug and alcohol abuse, noise, traffic, and social unrest.

COLAB-4

The permitting data reveals the terrible truth: Notwithstanding all the rhetoric, hardly any dwelling units are being permitted in the unincorporated area at all. Remember, the table below summarizes the number of units permitted, not the number actually constructed. The largest numbers are in the South County area and mainly consist of units permitted decades ago in the Nipomo golf communities. Most of the units are the result of the developers implementing a deferred phase of construction, not truly new permits.

COLAB-5

4

Were it not for these the County would have permitted less than 100 during the fists 3 quarters c 2021 – 22.

New Dwelling Units [1] by Planning Area/Sub Area, 2005-2021

Planning Area/Sub Area	05-06	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21[2]
Adelaida	24	12	21	11	3	5	3	2	5	5	4	8	5	8	6	4
Carrizo [3]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
El Pomar-Estrella	90	53	33	14	9	11	10	20	38	16	28	19	22	26	15	12
Estero	19	15	13	6	10	8	3	6	13	8	7	18	6	10	7	7
Las Pilitas	0	6	5	2	5	1	3	1	2	1	0	1	1	1	0	2
Los Padres (North)	2	0	0	0	1	2	1	0	0	0	0	0	0	0	0	0
Nacimiento	43	32	18	11	7	9	10	33	50	21	20	25	27	18	14	9
North Coast	14	7	9	1	5	0	3	7	2	3	2	0	0	2	1	1
Salinas River	99	41	33	36	25	16	15	21	45	60	65	207	74	86	65	37
San Luis Bay Coastal	52	22	70	7	15	13	17	34	41	25	30	39	41	9	11	1
San Luis Obispo Shandon-Carrizo (North)	11	9	11	2	4	4	5	6	9	2	4	10	5	8	12	10
South County[4]	28	28	11	5	2	4	6	2	4	0	4	4	3	6	5	12
South County Coastal [3]	71	34	77	19	17	40	35	114	157	116	113	161	131	118	102	116
Total	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
	453	259	301	114	103	113	111	246	366	257	277	492	315	292	238	211

1. Only including units subject to the Growth Management Ordinance. For 20015-2016, based on number of construction permit applications received in fiscal year. For 2017-2021, based on number of construction permits issued in fiscal year.
2. As of April 26, 2021.
3. Carrizo and South County Coastal Planning Areas were added to this chart for FY 21-22 and were not tracked in previous years' annual allocation reports.
4. Huasna-Lopez Sub Area was removed from this chart for FY 21-22 because it is included in the South County Planning Area.

COLAB-5 (cont'd)

In these regards, as outlined above, the entire EIR and process are terribly flawed and designed to kill the project. After all, it lists alternative 3 as the preferred project**.** Under Alternative 3, the residential land use category would be limited to approximately 78 to 390 rural residential units (plus associated ADU development) instead of the 1300 proposed in the application.

Alternative 3 would be less dense, have many fewer homes, and lack the economies of scale necessary to produce work force and low income units.

COLAB-6

Specific Dana Reserve Class I Impacts:

Air Quality.

Actually, the project appears to meet or exceed all the clean air requirements that pertain to existing or potential problems from dunes dust, chemical, agricultural, or other sources.

COLAB-7

5

Instead, the key unmitagatable source (CO2 and other tailpipe gases) is alleged to be the fact that the project would increase the housing jobs imbalance and the new residents would have to drive their cars to area employment centers, most likely in Santa Maria and San Luis Obispo.

Inconsistent. The proposed project is located within the NCSD Sphere of Influence (SOI). Nipomo is an unincorporated area that is jobs poor. The project would result in the creation of 1,441 dwelling units (including ADUs) and approximately 273 new jobs, which would increase

COLAB-7 (cont'd)

anticipated to hinder regional and local improvements related to increased transportation mobility and potential increase in VMT. Although the DRSP would include commercial uses and infrastructure to promote the use of public transit and walking and bicycling (e.g., Park and Ride lot, transit service expansion, connections to bicycle lane network), it would remain inconsistent with this measure.

The project is to be built in phases over many years. The State of California has set 2035 as the year when no new fossil fuel vehicles can be sold in the State. During the run up period over the next decade the number of fossil fuel cars should decline swiftly. This barrier, and its assignment as an unmitagtable Class I Impact, is therefore false as the problem is already scheduled to be solved.

COLAB-8

The EIR cites the fact that the project would exceed VMT in reaching its conclusion. This is detailed in the Transportation section of the DEIR

Table 4.3-8. Project VMT Impact Summary

Category	VMT Per Employee	VMT Per Capita
County Threshold	25.7	27.2
Proposed Project	26.9	30.0
Percent Reduction in VMT Required to Reduce to Below Threshold	**4.46%**	**9.34%**

Source: AMBIENT (2022)

Other operational air quality impacts of the project are also listed as unmitigatable.

With implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational annual emissions would be reduced to below SLOAPCD's significance threshold; however, daily emissions would continue to exceed SLOAPCD's significance threshold. Therefore, impacts related to the generation of criteria pollutants in exceedance of established daily emissions thresholds would be significant and unavoidable.

COLAB-9

6

Table 4.3-11. Operational Emissions without Mitigation

	Emissions[1]						
					PM_{10}		
Operational Period/Source	**ROG**	**NOx**	**ROG+NOx**	**CO**	**Fugitive**	**Exhaust**	**Total**
Daily Emissions (lbs/day)							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
Total Project Emissions	95.4	64.6	**160.0**	473.3	**115.8**	**2.0**	117.8
SLOAPCD Significance Thresholds	--	--	**25**	**550**	**25**	**1.25**	--
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	No	**Yes**	**Yes**	--
Annual Emissions (tons/year)							
Total Project Emissions	15.6	10.1	**25.7**	72.0	17.6	0.3	17.9
SLOAPCD Significance Thresholds	--	--	**25**	--	**25**	--	--
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

[1] Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

COLAB-9 (cont'd)

Biological Resources

The EIR Summary Table indicates that the Biological Resources constitute a Class I unmitagatable resource. A lengthy chapter is presented on this subject that lists scores of plant and animal species which will suffer harm if the project is built. It also contains pages of minutiae about possible mitigations. All this is quite confusing.

At the end of the chapter there is a statement of unmitagatable class I resource.

4.4.6 Cumulative Impacts BIO Impact 20: The project would have cumulatively considerable impacts related to biological resources. Cumulative impacts would be significant and unavoidable (Class I). The proposed project's contribution to cumulative impacts on biological resources is based on the loss of open space and associated wildlife habitat. The Specific Plan Area primarily consists of Burton Mesa chaparral, coast live oak woodland, and coast live oak forest, intermixed with various grassland habitats. Several special-status plant and animal species and two sensitive vegetation communities occur on-site, all of which would be impacted by the proposed development, except for 21.7 acres of primarily coast live oak forest habitat. The County anticipates several smaller residential development projects in the surrounding community and two major development projects.

COLAB-10

7

Basically, it appears that any project of any significance would be too impactful. Obviously, the construction of even 50 houses and some commercial would result in cutting down trees, removing the bushes, etc.

The mitigations listed seem to be massive detailed lists of further studies, annual reporting, and impractical projects.

This section needs to be summarized and structured in way that the public and decision makers can actually assess the gravamen of the issue. In fact a portion of the chapter states:

Evidence of episodic disturbance from farming was observed in the field and from aerial imagery dating back to 1939. Field evidence of very old woodland clearcutting suggests a link to a historic drought between 1862 and 1864 when ranchers were compelled to fell trees for livestock consumption (Guinn 1890; and personal communications between Althouse and Meade with Jim Sinton, family rancher familiar with the Nipomo Mesa). Google Earth imagery indicates that the grassland west of US 101 was last farmed in about 2002, or possibly 2006 (Althouse and Meade 2022a).

Farming, mowing, and chaparral (brush) removal appears to have been conducted for decades. Imagery from 1939 shows evidence of brush clearing on rolling topography and farmed fields on flatter terrain, and imagery from 1949 indicates some of the brush cover and associated coast live oaks (Quercus agrifolia) were starting to grow back. Some brush clearing is evidenced in 1957. The 1969 to 1994 aerials show chaparral cover generally increasing in areas not actively farmed. Between 1994 and 2002, shrub reduction appears to have reduced brush cover while retaining young trees barely visible in the 1994 imagery. Aerial images from 2002 and years thereafter show reduced brush cover. Livestock pens are visible in 2011 to 2013 aerial imagery.

Two additional parcels provide a connection from Cherokee Place on the north side of the ranch to Willow Road. The western 7-acre parcel is undeveloped and shows evidence of significant site disturbance from past dry farming. There are no trees, weedy species dominate, and a few bushes have become reestablished and/or have regenerated since 2010 when the last mowing appears to have occurred. The eastern 7-acre parcel is densely wooded with a residence and numerous animal pens for horses, chickens, and other animals.

This is not some pristine natural land untouched by humans.

Greenhouse Gas Emissions

COLAB-10 (cont'd)

COLAB-11

8

GHG Impact 3 (Class I)
The project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
Mitigation Measures
Implement Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1.
Residual Impacts
Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 would reduce potential impacts related to operational GHG emissions from the proposed project. However, the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 RTP/SCS and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain. Therefore, with implementation of identified mitigation, potential impacts would be significant and unavoidable (Class I).

Cumulative Impacts GHG Impact

The project would result in a cumulatively considerable impact to greenhouse gas emissions. Cumulative impacts would be significant and unavoidable (Class I). As discussed in Chapter 3, Environmental Setting, the cumulative impact analysis is based on the County's cumulative projects list. Cumulative projects would generate residential, industrial, and commercial development within the county. Project-specific impacts related to the generation of short and long-term GHG emissions would be less than significant with mitigation.

COLAB NOTE: This pretzel logic. Recognizing that the planet is a closed eco system, nothing more could ever be bold anywhere in the world which generates any significant CO_{2e} . The fact that the measure is confined to SLO is ridiculous since the alleged problem is planetary. The DEIR is simply cherry picking the arbitrary county boundary as its frame of reference.

COLAB-11 (cont'd)

Based on required compliance with existing diesel idling requirement, the CBC and CALGreen, and the County's solid waste reduction goals, reasonably foreseeable future projects are not anticipated to result in short- or long-term GHG emissions that would conflict with established thresholds. Nevertheless, reasonably foreseeable future projects would be subject to separate environmental review to determine potential impacts related to GHG emissions and reduce GHG emissions, as necessary. Therefore, impacts would be less than cumulatively considerable.

The project would generate VMT that would exceed the significance threshold of 25.7 VMT per employee and 27.2 VMT per capita; therefore, the proposed project would be inconsistent with the 2019 RTP/SCS and the effectiveness of identified mitigation included to reduce this impact is not certain, thus it would remain significant and unavoidable. Reasonably foreseeable future projects would likely contribute to VMT within the vicinity of the Specific Plan Area. Individual future projects would be subject to separate environmental review to determine individual

COLAB-12

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impacts related to consistency with the 2019 RTP/SCS and implement reduction measures as necessary and feasible.

Other reasonably foreseeable future projects are not anticipated to generate population growth or VMT of this scale; however, reasonably foreseeable future projects within the vicinity of the Specific Plan Area still have the potential to contribute VMT and further exceed established thresholds.

Since other reasonably foreseeable future projects are anticipated to generate substantially less population growth and VMT, implementation of long-term VMT reduction strategies would likely mitigate impacts to below established VMT thresholds. However, due to project-specific significant impacts, cumulative impacts would be significant and unavoidable

COLAB-12 (cont'd)

Table 4.8-2. SLOAPCD GHG Thresholds of Significance

Operational Year	2030
Land Use Sectors GHG Emissions Target[1]	213,000,000
Population[2]	41,860,549
Employment[3]	20,729,820
Service Population (SP)	62,590,369
GHG Efficiency Threshold ($MTCO_2e$/SP/year)	3.4

Source: AMBIENT (2022)

This chart is for the whole county. It is not just for the emissions attributable to the unincorporated county over which the Board of Supervisors has regulatory land use authority. It is unfair and the goal should be for the unincorporated county. Note that per the table below , from its adopted Energy Wise Plan.

Where does the 213,000,000 (million) come from?

Is this for the whole county including cities?

The unincorporated county only generated 917,000 in 2006.

It should be less now as the County has implemented a number of CO2 reducing programs and projects.

COLAB-13

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The primary sectors of GHG emissions are transportation (40%), commercial and industrial energy (24%), agriculture (off-road equipment, livestock, and crops) (18%), residential energy (15%), waste (3%), and aircraft (less than 0.1%).

Figure 3-4. Unincorporated San Luis Obispo County 2006 GHG Emissions

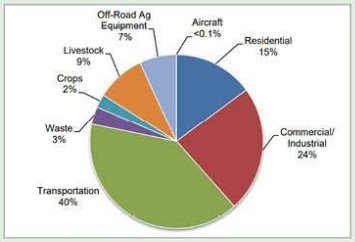
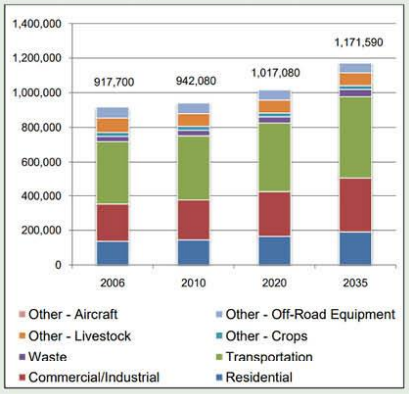


Table 3-1. Unincorporated San Luis Obispo County 2006 GHG Emissions

	2006 GHG Emissions ($MTCO_2e$)	Percentage of Total Emissions
Residential	136,360	15%
Commercial/Industrial	215,970	24%
Transportation	365,260	40%
Waste	30,540	3%
Other – Crops	22,630	2%
Other – Livestock	83,420	9%
Other – Off-Road Equipment	63,280	7%
Other – Aircraft	240	< 0.1%
Total	917,710	100%[1]

1. Due to rounding, the sum of individual values may not equal the total given.

Figure ES-3. Community-Wide GHG Emissions Forecast ($MTCO_2e$)



COLAB-14

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Table 4.8-5. Operational GHG Emissions Without Mitigation

Operational Year/Source	2030 GHG Emissions ($MTCO_2e$/year)
Area Source[1]	32.9
Energy Use[2]	2,477.2
Motor Vehicles[3]	13,836.04
Waste[4]	368.2
Water[5]	169.6
Total Operational Emissions	16,884.0
Amortized Construction Emissions	987.3
Total with Amortized Construction Emissions	17,871.3
Service Population (SP)[6]	4,826
$MTCO_2e$/SP	**3.7**
GHG Efficiency Significance Threshold	**3.4**
Exceeds Threshold?	**Yes**

Source: AMBIENT (2022)

COLAB-14 (cont'd)

This section of the DEIR lacks appropriate context and data:

- What percent of SO County's total $MTCO_{2e}$ emissions do 17,871.3 represent? Is this significant enough to reject the project?
- What percent of California's total $MTCO_{2e}$ emissions do 17,871.3 represent?
- As noted above, if all new vehicles sold in 2035 and after must be electric, what is the validity of this finding?
- Given all of other new and accumulated State regulations on vehicle emissions, how valid is the 13, 836.04 number?
- Are the calculations formulae underlying the number based on current laws or were the formula basis developed 5 years ago?

COLAB-15

Land Use and Planning

Car Pollution by the Trip to Work: This section promulgates 3 Class I unmitable imapcts . The first one , below, is based the Countypolicy that homes should be bult close to work palces. The problme is tthat the largest employers are in Santa Maria, San Luis Obispo, the Cal Poly Campus, the Atascadero State Hospital, and several scattaered large school districts. The County chased the largest Nipomo employer (Philipps 66) out of the County when it rejected a lager oil loading facilty.

COLAB-16

As noted above , the DEIR Clean Air analysis is obslote and based on old data. Morevoer it is scientifially irrational as it arbtralaly restreicts the CO_{2e} problem boundary to theamount generated in the County. Even if the County and Calfironia become entireley carbon free, the United States would have to invade and subdue China, Russia, India, North Korea, Iran, and now

COLAB-17

12

the European Union to compel them to reduce their expenotial expansion of fossil fuel use. This would be a war which the US would lose. China would wind up admistering western north America which would end any consderation of this symbookc and destrictive set of policies.

LUP Impact 3 (Class I)
The project would adversely affect the local jobs-to-housing ratio within the project area and would be inconsistent with Land Use Planning Policy L-3 of the San Luis Obispo County Clean Air Plan.
Mitigation Measures
No feasible mitigation has been identified.
Residual Impacts
Potential impacts associated with policy inconsistency would be significant and unavoidable (Class I).

COLAB-17 (cont'd)

Rare Plants: The DEIR promulgates an unmitagatable Class I Impact due to rare plants on the site. It is a mixed chaparral / oak woodland which cover thousands of sq. miles in southern and central California. While the development would impact specific plant on the site, it would not strategically impact the overall range of the species.

COLAB-18

Moreover the site has been anthropomorphically disturbed over the decades by grazing and agriculture. This is not a pristine evolutionary biological community.

COLAB-19

In 2011, the County Planner who wrote the Conservation and Open Space element revealed us that it was designed to forestall as much development as possible. He was amazed that there was not more public opposition.

COLAB-20

Once again the site is being treated as if it were the universe as opposed to an infinitesimal portion of the Oak/Chaparral environment.

COLAB-21

Reportedly, the California Rare Plant Society has threatened to sue the County if the project is approved. Of course hundreds of acres of this environment are burned to scorched earth over the years because governments will not allow controlled burns, fire breaks, timber harvesting, agriculture, and other fire control mechanisms. Should they sue, the Planner should be subpoenaed to the depositions and testify under oath about his biased development of the ordinance.

LUP Impact 5 (Class I)
The project would result in the net loss of California Rare Plant Rank 4 and Watch List plant species, native oak woodland, and sensitive habitats; therefore, the project would be potentially inconsistent with goals and policies of the County of San Luis Obispo General Plan Conservation Open Space Element pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element.

COLAB-22

4.11-37

13

Sensitive Biological Resources: and Views Here the DEIR finds a Class I unmitagatable impact due to the conversion of the view of the site to a development and the loss of biological resources **.**

Views: Most of the people viewing the site are driving past it on Highway 101 at 65 miles per hour while focusing on the cars ahead of them to avoid the frequent back down induced rear end crashes which occur in that section the highway. They only have a few seconds to look. Moreover, the west side section of the highway immediately to the South contains a series of commercial developments including a large Flea Market, RV Sales lot, furniture outlets, bill boards, and condominiums. The east side contains a pot puree of dilapidated trailer parks, bill boards ,dog kennels, plant nurseries and broken down vehicles.

The DEIR is totally out of context of the area and is a reducto ad absurdum . This isn't the Hearst Ranch or even the Leticia Vineyard.

COLAB-23

LUP Impact 10 (Class I)
The project would result in cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features.
Mitigation Measures
Implement Mitigation Measures AES/mm-3.1 and AES/mm-3.2, AES/mm-7.1, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1.

Population and Housing

The DEIR asserts that the project will generate too much unplanned population for the Nipomo area. In fact, the County population growth has fallen below all recent estimates. Most of it is in Paso Robles. Also the County has driven its largest Nipomo employer Phillips 66 out of the County and never lifted a finger to help PG&E maintain the Diablo Nuclear Power Plant proving 2000 jobs just a few miles up Highway 101 from Dana project site in n Avila Beach.

COLAB-24

Nevertheless, the DEIR ignores this fact and dwells on Plan inconsistency.

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PH Impact 1 (Class I)
The project would induce substantial unplanned population growth in the Nipomo area.
Mitigation Measures
No feasible mitigation has been identified.
Residual Impacts
Potential impacts associated with substantial unplanned population growth would be significant and unavoidable (Class I).

Based on the analysis above, the DRSP is anticipated to result in the future construction of 831 singlefamily dwelling units, 458 multi-family dwelling units, and 152 ADUs. According to the U.S. Census Bureau, the average household size in Nipomo between 2015 and 2019 was 3.16. In order to calculate a more conservative population estimate, the Nipomo average household size was used to calculate the project's estimated residential population rather than rely on the countywide average household size of 2.51. Based on the average local household size in Nipomo, future buildout of DRSP residential land uses is anticipated to result in a residential population increase of approximately 4,555 (Table 4.14-13).

Specific Plan Area PH Impact 1: The project would induce substantial unplanned population growth in the Nipomo area. Impacts would be significant and unavoidable (Class I). The DRSP would allow for the future phased development of residential uses, village commercial uses, flex commercial uses (including light industrial uses), open space, trails, and a public neighborhood park within the 288-acre Specific Plan Area.

Table 4.14-14. Project Residential Population Generation

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size[1]	Estimated Population Generated
Single-Family	831	3.16	2,626
Multi-Family	458		1,448
Accessory Dwelling Units	152		481
Total	**1,441**	--	**4,555**

[1] Source: U.S. Census Bureau (2019)

COLAB-24 (cont'd)

The finding is that unplanned population growth is inconsistent with various plans. However, other than the assertion that the housing to jobs ratio is skewed and that the vehicle miles traveled would increase, there is no data demonstrating that the phased build out the proposed development would cause any real harm in terms of public health and safety.

COLAB-25

There are no problems with utilities (in fact the project benefits the entire area population in terms of water availability and cost), no public safety issues, no parks issues, no school issues,

COLAB-26

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ET. In fact the DEIR lists all the other measures in this category as potentially consistent with policies, plans , and ordinances.

COLAB-26 (cont'd)

The jobs /housing balance is a red herring because there is no way that Nipomo has sufficient land zoned for large commercial projects such as office parks. In fact the Dana reserve project actually provides development which ads 250 jobs. As we note above in the Land Use and Planning Section , the key employers are in or adjacent to the City of San Luis Obispo and in the City of Santa Maria.

Area governments, institutions , am private sector employers all not difficulty in recurring and retaining employees. One of the main reasons is lack of housing.

COLAB-27

In this case the DEIR would have the decision makers look a gift horse in mouth in all respects in compliance with stale and obsolete policies produced by ideological anti-growth staffers over a decade ago.

Transportation

This section simply regurgitates the impossibility of adding more homes without adding any traffic . It does however list the potential of some mitigation which could help.

TR Impact 3 (Class I)	
Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds.	
Mitigation Measures	
TR/mm-3.1	*A transportation demand management program or identification of transportation demand management strategies to implement would be required of each applicant. The residential, commercial, education, and/or hotel development applicant in consultation with the County of San Luis Obispo will choose feasible transportation demand management strategies and tailor to the development proposal. Potential measures to reduce vehicle miles traveled include, but are not limited to:* 1. *Improve or increase access to transit* 2. *Increase access to common goods and services* 3. *Incorporate affordable housing into the project* 4. *Orient the project towards transit, bicycle, and pedestrian facilities* 5. *Improve bicycle and/or pedestrian facilities and/or transit services* 6. *Limit or eliminate parking supply* 7. *Implement or provide access to commute reduction programs* 8. *Provide car-, bike-, and ride-sharing programs* 9. *Provide transit passes* 10. *Provide on-site amenities at places of work*

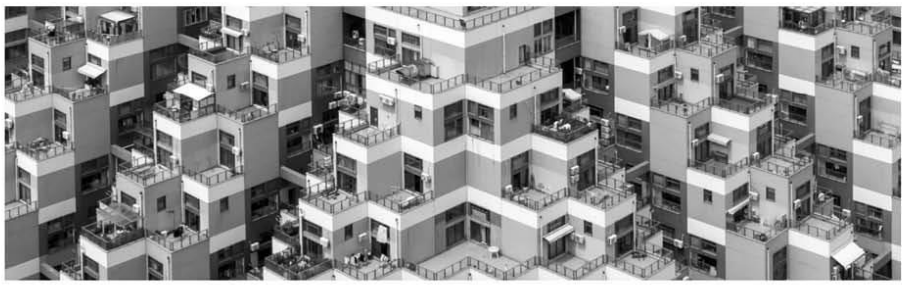
COLAB-28

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TR Impact 9 (Class I)
The project would result in a cumulatively considerable impact to transportation and traffic.
Mitigation Measures
Implement Mitigation Measure TR/mm-3.1.
Residual Impacts
Cumulative impacts related to consistency with applicable plans, hazardous roadways design, and emergency access would be avoided through compliance with identified project-specific mitigation; no additional mitigation is needed to avoid or minimize potential cumulative impacts. However, implementation of Mitigation Measure TR/mm-3.1 would not reduce impacts to a less-than-significant level. Therefore, residual cumulative impacts would be significant and unavoidable (Class I).

COLAB-28 (cont'd)

ADDENDUM I



THE DEHUMANIZING TYRANNY OF DENSIFICATION

The prevailing vision of environmentalism today caters to a global oligarchy.

BY EDWARD RING

Filing cabinet of human lives, Where people swarm like bees in tunneled hives, Each to his own cell in the covered comb, Identical and cramped—we call it home."
— Gerald Raftery, "Apartment House"

The conventional wisdom among America's liberals, often seconded and rarely challenged by conservatives, is that population growth in the United States should be channeled as much as

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COLAB-29

possible into the footprint of existing cities. Surrounding cities should be "greenbelts," suburban growth should be rejected as unsustainable "sprawl," and human settlement in areas defined as the "urban-wildland interface" should be discouraged and, where possible, reversed.

The movement to increase the population density of cities and reduce rural populations is already enshrined in California law and is rolling quietly across the rest of the nation. It is marketed as enlightened, environmentally sustainable urban planning, but the moral pretext obscures a self-serving density agenda that is shared by several powerful special interests.

Among all the misanthropic trends in public policy that threaten the freedom and prosperity of ordinary Americans, the density agenda is probably the least discussed.

Stated simply, population densification will fundamentally undermine Americans' ability to preserve their freedom and independence. You don't have to reference Agenda 2030—about which it is now almost *impossible* to find any negative commentary online—to understand how easily a population can be controlled when it is relocated and concentrated into a handful of megacities.

In the 1990s, shortly before the end of apartheid, I remember speaking with someone who had just returned from a tour of South Africa. He commented on his impressions of the densely populated black townships that were adjacent to every major city.

"They've got them all bottled up tight as sardines in a can," he said, "nice and neat, so whenever they want, they can zap them all."

Here is an aerial photo of neighborhoods in Soweto, just outside Johannesburg. It was perhaps the most infamous township of the apartheid era.

18

COLAB-29
(cont'd)

The Racist Bantustan

Soweto, South Africa
40' x 80' lots, single family dwellings



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COLAB-29
(cont'd)

This image, which corresponds to a population density exceeding 20,000 people per square mile, reveals how blacks in Soweto were pushed into packed neighborhoods where they could easily be contained in the event of mass civil unrest.

In America, even this population density is frowned upon by enlightened environmentalists. After all, those people lived in "single-family dwellings," which are themselves "exclusionary" and "unsustainable." In California, and against the odds, politically connected developers can still build limited numbers of single-family dwellings because free-standing individual homes are the overwhelming choice of families, if they can afford them.

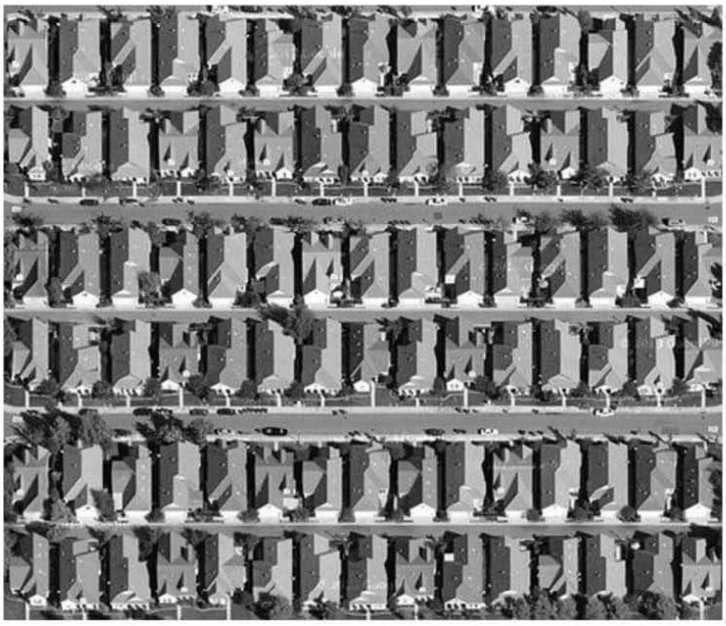
Featured below is an aerial photo of such a development in Sacramento, California's state capital and one of the citadels of green extremism. Note the lot size. These 40-by-80-foot lots are precisely the same size as those in Soweto.

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COLAB-29
(cont'd)

The Green Bantustan

Sacramento, California
40' x 80' lots, single family dwellings



How those neighborhoods are evaluated by mainstream commentators bespeaks a blithe hypocrisy. In Soweto, such neighborhoods were variously described as concentration camps where people were confined and subjected to inhumane crowding. In Sacramento, these neighborhoods are under attack as environmentally incorrect "sprawl," as laws and zoning increasingly favor multifamily dwellings.

Causes and Effects

Economics, not any particular concern for the planet, drives the density agenda. Chief among these economic imperatives is to render housing barely affordable. Reducing the supply of housing while increasing the U.S. population through loose immigration policies creates shortages, which then drive-up prices.

Perpetually inflating the value of real estate, in turn, creates new asset collateral. This helps balance the U.S. trade deficit, as foreign investors repatriate dollars by buying expensive American real estate. It also enables the ongoing U.S. trade deficit, as homeowners are seduced

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COLAB-29
(cont'd)

into borrowing against their home equity to purchase imported consumer products. The macroeconomic scheme that lets Americans print as much currency as they want and monetize

the world with dollars purchasing foreign goods is sustained, in large part, by keeping the value of U.S. real estate artificially high.

That isn't the only reason to cram people into the footprint of existing cities and jack up the cost of all housing through engineered shortages. The interests of public-sector unions and public utilities are another powerful driver obscured by density policies.

Public-sector unions always benefit when public infrastructure spending is restricted due to environmental concerns. Instead of investing public funds to build and upgrade reservoirs, aqueducts, and freeways, public agencies can allocate more of their budgets to increasing the pay and benefits for government workers. Local public-sector fiefdoms also benefit when the population is increased in existing jurisdictions. In the past, the integrity of existing suburbs would not be violated, and instead, new cities outside established jurisdictions would gain those new residents and collect the new tax revenue.

Public utilities have a powerful financial incentive to embrace the density agenda and its intimate sibling, the renewables agenda. When people are forced to ration energy and water as more people are crammed into existing neighborhoods, the same utility grids—water, power, and wastewater—can be employed without costly expansion. Never mind that residents will now be restricted to 40 gallons of indoor water use per day, or pay to have expensive dual water meters installed so bureaucrats can impose and monitor an outdoor "water budget." Never mind that renewable electricity flowing through smart meters will cost households 50 cents or more per kilowatt-hour during peak demand times, or that there will no longer be enough wastewater flowing through the sewer pipes to move the effluent.

COLAB-29
(cont'd)

Public utilities will deliver less of everything but charge much more. Their revenue will go up even as their deliveries go down. And since their earnings are restricted to a regulated percentage of total revenue, they will make more profit than ever.

Planned Obsolescence Is the New Normal

The density agenda is the product of intersecting benefits that attract a powerful coalition of special interests. In almost every sector of the economy, monopolistic corporate special interests have navigated a profitable path that furthers the shared agenda.

When environmentalist-inspired regulations make it almost impossible to get building permits, public entities collect higher fees, and favored developers build homes they can sell for more money and more profit. When environmentalists litigate to stop the construction of a new

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reservoir, public agencies retain the funds for more internally remunerative uses, and the possibility of new home construction is diminished. Without access to water, new homes cannot get built. When homes are too expensive for most families to afford, institutional investors roll in and buy whole subdivisions and rent them all, depriving Americans of what throughout our history was the most reliable way to build generational wealth.

It is crucial to understand the collaborative role of the high-tech industry in all this. Property management by institutional investors, along with the operation of modern appliances by

individual homeowners, will be facilitated by appliances connected to the internet and algorithmically monitored.

Tech firms will secure perpetual and lucrative new revenue streams supplying hardware components for this entire surveillance panopticon, along with collecting fees for mandatory and frequent software updates. Remember the bored Maytag repair man? Those days are done. Technological "upgrades" to enable ultra-efficient appliances mean you'll replace your refrigerator, washer, dryer, dishwasher, hot water heater, and every other durable good as often as you replace your smartphone. Planned obsolescence, masquerading as green and empowering, is the new normal.

COLAB-29
(cont'd)

Rationing in all its forms—and seldom ever called by that name—rewards the entrenched elite and harms everyone else.

Banks, institutional investors, mega housing developers, international corporations, tech heavyweights, public utilities, and public agencies all prefer high density. Environmentalism provides cover.

None of this is meant to disparage legitimate expressions of environmentalism. If one wishes to ignore the economic reasons for the high-density movement and ascribe to density proponents purely enlightened motivations, then this comes down to two competing visions of environmentalism and sustainability.

One of them recognizes the importance of building enabling infrastructure so small investors and individual families can afford to live however they wish. Some will prefer the amenities of a densely populated urban core, and others will prefer the ambiance of spacious suburbs. But the notion that Americans are running out of room or resources to build new suburbs is as delusional as the idea that only a "smart" appliance can achieve acceptable levels of efficiency and sustainability. All too often, these are merely opportunistic lies endlessly parroted by journalists who have never examined the facts.

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The prevailing vision of environmentalism today, unfortunately, caters to a global oligarchy. They have decided it is in their interests, along with the interests of the planet—most definitely in that order—to preach imminent doom. Stack and pack, do it for the earth, and laugh all the way to the bank.

Edward Ring is a senior fellow of the Center for American Greatness. He is also a contributing editor and senior fellow with the California Policy Center, which he co-founded in 2013 and served as its first president. Ring is the author of Fixing California: Abundance, Pragmatism, Optimism (2021) and The Abundance Choice: Our Fight for More Water in California (2022). This article first appeared in the July 26, 2022 edition of American Greatness.

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COLAB-29
(cont'd)

9.3.8.1 Response to Letter from Coalition of Labor Agriculture & Business of San Luis Obispo County

Comment No.	Response
COLAB-1	The comment refers to the Class I impacts identified for air quality, biological resources, greenhouse gas emissions, population and housing, and transportation and states the findings would prohibit decision makers from approving the project, except that CEQA provides that project alternatives can be considered if the project cannot be moved to a different location and, in this case, the developer does not own an alternative site where the project could be located. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes in the environmental document are necessary in response to this comment.
COLAB-2	The comment provides data from the County's Housing Element and notes that similar privately-owned sites do not exist in other parts of the unincorporated county. No changes in the environmental document are necessary in response to this comment.
COLAB-3	The comment relates to concerns regarding economic viability of developing affordable homes in the county. This comment addresses concerns associated with the County's Housing Element, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
COLAB-4	The comment relates to social and racial issues that are not considered environmental effects under CEQA. No changes to the environmental document are necessary in response to this comment.
COLAB-5	The comment provides data related to the construction of units in the South County area and states that few dwelling units are being permitted in the unincorporated area of the county. This comment addresses concerns associated with the County's lack of permitted dwelling units, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-6	The comment suggests the identification of Alternative 3 as the preferred project would lack the economies of scale to produce workforce and low-income units. This is consistent with the analysis in Section 5.4.4.1 of the EIR. The EIR has been prepared for the proposed project pursuant to CEQA. Per Public Resource Code § 21002.1, the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. The EIR has not been prepared to support or kill the project, but has been prepared to identify impacts of the project, as proposed, on the environment based on substantial evidence. As discussed in Chapter 5, *Alternatives Analysis*, the State CEQA Guidelines require an analysis of alternatives to identify an environmentally superior alternative among the alternatives evaluated in the EIR. The environmentally superior alternative is the alternative that would minimize adverse impacts to the environment. Based on the evaluation of alternatives, the No Project Alternative would be the environmentally superior alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is also the environmentally superior alternative, the EIR should then identify an environmentally superior alternative among the other alternatives. As summarized in Table 5-3, Alternative 2 (La Cañada Ranch Specific Plan) and Alternative 3 (Residential Rural Cluster Subdivision) would both reduce the project's significant environmental impacts related to GHG emissions, land use and planning, and population and housing. In addition, Alternative 2 (La Cañada Ranch) would further reduce impacts to air quality and transportation, but would increase potential impacts to recreation. Alternative 3 (Residential Rural Cluster Subdivision) would further reduce impacts to biological resources and public services compared to the proposed project, but would potentially increase impacts to utilities and service systems if annexation into the NCSD service area was not feasible. Alternative 3 would meet more of the project's basic objectives than Alternative 2. Therefore, Alternative 3 would be considered the environmentally superior alternative because it would reduce the project's significant impacts and more successfully meet the basic project objectives. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment. Refer also to Chapter 10, Supplemental Analysis of the 2023 DRSP.
COLAB-7	The comment states that the project appears to meet or exceed all clean air requirements that pertain to existing or potential problems from dunes dust, chemical, agricultural, or other sources. Refer to Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions. No changes in the environmental document are necessary in response to this comment.

Comment No.	Response
COLAB-8	The comment suggests that a Class 1 impacts related to mobile-source GHG emissions is unnecessary. The precise timing of development of proposed residential and commercial uses within the Specific Plan Area is unknown and would depend on market factors and the goals of individual developers. However, based on a market analysis prepared by the project applicant and project goals, and for purposes of this EIR analysis, it is conservatively anticipated that the project would be built out over approximately 7 years. While it is possible that the number of fossil fuel cars will decline swiftly over the next decade, the actual reduction is currently unknown and cannot be quantified; additionally, existing fossil fuel vehicles will continue to be used by prior owners. Therefore, the EIR conservatively captures the worst-case scenario to evaluate impacts and provides mitigation to address potentially significant impacts and accurately reflects the potential impact associated with air quality emissions as significant and unavoidable. No changes to the environmental document are necessary in response to this comment.
COLAB-9	The comment states that the EIR cites the exceedance of VMT and operational air quality impacts in reaching its conclusion. No changes to the environmental document are necessary in response to this comment.
COLAB-10	The comment notes that Class I impacts have been identified for biological resources and suggests the lengthy chapter presented on this subject is confusing. Section 4.4, *Biological Resources*, in the EIR has been prepared to address the required checklist questions identified in Appendix G of the State CEQA Guidelines pertaining to biological resources. The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County. The impact assessment focuses on identifying potential impacts associated with implementation of the project and is based on the site's existing conditions, the regulatory setting, and the project description. The emphasis is on determining the potential effects of the project on federal, state, and locally regulated species and habitats on the project site. Adverse impacts could occur if the project could result in temporary or permanent modification of sensitive communities or habitats occupied by special-status species, or directly affect special-status species. The impact assessment is based on the results of technical studies prepared for the project (Althouse and Meade 2022a) (see EIR Appendix E). The mitigation measures are understandably complex. No changes to the environmental document are necessary in response to this comment.
COLAB-11	The comment suggests the cumulative impacts related to greenhouse gas emissions should not be confined to the county boundary since it is a global problem. As discussed in Section 4.8, *Greenhouse Gas Emissions*, the impact methodology has been prepared pursuant to the State CEQA Guidelines. A significant impact related to GHGs would occur if the proposed project would generate GHG emissions that exceed established SLOAPCD thresholds or conflict with a plan, policy, or regulation related to GHG emissions. Pursuant to the State CEQA Guidelines Section 15064.4, a project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. No changes to the environmental document are necessary in response to this comment.
COLAB-12	The comment has cited text from Section 4.8, *Greenhouse Gas Emissions.* No changes to the environmental document are necessary in response to this comment.
COLAB-13	The comment refers to Table 4.8-2 in Section 4.8, *Greenhouse Gas Emissions*, and states the thresholds should only be applicable to the unincorporated county over which the Board of Supervisors has regulatory land use authority. The information in Table 4.8-2 is based on the GHG thresholds of significance developed by the SLOAPCD, which has jurisdiction of the entire South Coast County Air Basin (SCCAB), not just the county or the unincorporated areas of the county. In Table 4.8-2, 213,000,000 represents the SLOAPCD's land use sectors GHG emissions target based on CARB 2017 Climate Scoping Plan Update/SB 32 Scoping Plan Emissions Sector targets. No changes to the environmental document are necessary in response to this comment.
COLAB-14	The comment has cited text from Section 4.8, *Greenhouse Gas Emissions.* No changes to the environmental document are necessary in response to this comment.
COLAB-15	The comment states the Greenhouse Gas section of the EIR lacks appropriate context and data. Please refer to responses to comments COLAB-11 and COLAB 13. No changes to the environmental document are necessary in response to this comment.
COLAB-16	The comment states that the Land Use and Planning section of the EIR identifies three Class I impacts and reiterates the project's distance from existing job centers. No changes to the environmental document are necessary in response to this comment.
COLAB-17	The comment raises concern regarding the adequacy of the evaluation included for air emissions. Please refer to response to comments COLAB-11 and COLAB-13. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
COLAB-18	The comment states that mixed chaparral / oak woodland covers thousands of square miles in southern and central California and asserts the development would not impact the overall range of the species. As discussed in Section 4.4, *Biological Resources*, the Burton Mesa chaparral alliance has a Global/State rank of G1/S1 and is considered critically imperiled. Therefore, loss of almost all (approximately 97%) Burton Mesa chaparral habitat would be significant, and mitigation is necessary to reduce project impacts. The *Quercus agrifolia* / *Adenostoma fasciculatum* – (*Salvia mellifera*) alliance has a Global/State rank of G3/S3 and is considered a sensitive natural community by the CDFW (CDFW 2021b). Therefore, loss of almost all (approximately 96%) *Quercus agrifolia* / *Adenostoma fasciculatum* – (*Salvia mellifera*) habitat would be considered significant, and mitigation is necessary to reduce project impacts. No changes to the environmental document are necessary in response to this comment.
COLAB-19	The comment states that the site has been anthropomorphically disturbed over the decades by grazing and agriculture and is not a pristine evolutionary biological community. Section 4.4, *Biological Resources,* states evidence of episodic disturbance from farming was observed in the field and from aerial imagery dating back to 1939. No changes to the environmental document are necessary in response to this comment.
COLAB-20	The comment states that in 2011, a County planner who wrote the Conservation and Open Space Element revealed that it was designed to forestall as much development as possible. This comment addresses concerns associated with the County's Conservation and Open Space Element, not the proposed project or the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-21	The comment states that the site is being treated as if it were the universe as opposed to an infinitesimal portion of the oak/chaparral habitat. Please refer to response to comment COLAB-18. No changes to the environmental document are necessary in response to this comment.
COLAB-22	The comment states that the California Rare Plant Society has threatened to sue the County if the project is approved. No changes in the environmental document are necessary in response to this comment.
COLAB-23	The comment states that the Class I impact related to visual resources resulting from the conversion of the view of the site to a development and the loss of biological and visual resources is out of context. Landscape Architect, Robert Carr, ASLA, prepared the impact analysis included in the Aesthetics section of the DEIR and determined mitigation measures AES/mm-3.1 and AES/mm-3.2 would be sufficient to reduce potential impacts to the visual character of the site and its surroundings to a less-than-significant level. No changes to the environmental document are necessary in response to this comment.
COLAB-24	The comment states that the County population growth has fallen below all recent estimates and the largest County employers are leaving the county. No changes to the environmental document are necessary in response to this comment.
COLAB-25	The comment states that, other than the assertion that the housing-to-jobs ratio is skewed and that the vehicle miles traveled would increase, there is no data demonstrating that the phased buildout of the proposed development would cause any real harm in terms of public health and safety. Health effects related to vehicle emissions are addressed in Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, of the EIR. No changes to the environmental document are necessary in response to this comment.
COLAB-26	The comment states that there are no problems with utilities, no public safety issues, no parks issues, no school issues, etc. No changes to the environmental document are necessary in response to this comment.
COLAB-27	The comment questions the jobs/housing balance analysis and comments on the effects of the lack of housing. No changes in the environmental document are necessary in response to this comment.
COLAB-28	The comment cites text from Section 4.17, *Transportation*. No changes to the environmental document are necessary in response to this comment.
COLAB-29	The commenter has included *The Dehumanizing Tyranny of Densification* by Edward Ring as Addendum I to the comment letter. No changes to the environmental document are necessary in response to this comment.

9.3.9 Healthy Communities Work Group

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Healthy Communities

COALITION PARTNERS:

Bike SLO County
Cal Poly State University
Caltrans District 5
City of San Luis Obispo
Community Action Partnership of SLO County
First 5 San Luis Obispo County
Independent Living Resource Center, Inc.
People's Self-Help Housing
Rideshare – Safe Routes to School
Smart Share Housing Solutions
SLO Council of Governments
SLO County Departments:
- Air Pollution Control District
- Board of Supervisors
- Health Commission
- Public Health
- Environmental Health

SLO County YIMBY
SLO Legal Assistance Foundation

RESOURCES:

Data Dashboard, SLO Health Counts

Community Health Improvement Plan

Building Healthy Communities: Residential Checklist

Date: 8/1/2022

To: Jennifer Guetschow

From: The Healthy Communities Work Group

RE: Dana Reserve Specific Plan - Draft Program Environmental Impact Report

Dear Jennifer Guestschow,

The Healthy Communities Work Group is a collaboration between public health officials, local planning and transportation officials, community-based organizations, academia, and community members, working to improve health through community design. We provide research and evidence-based recommendations from a health perspective on proposed land use projects, ordinance and general plan amendments, and special projects.

The Healthy Communities Work Group has reviewed the Draft Program Environmental Impact Report (Draft PEIR) for the Dana Reserve Specific Plan, a proposed residential and commercial project to provide up to 1,289 single- and multi-family units located in Nipomo. HCWG strongly supports the Dana Reserve Specific Plan to increase accessible and affordable housing and provide designated paths for non-motorized users; both of which are identified as key priority areas in the 2019 SLO County Community Health Improvement Plan update.[1] **HCWG-1**

HCWG supports the project's objectives to increase affordable housing unit production and allowance of Accessory Dwelling Units. These objectives increase the likelihood of quality housing at a range of affordability levels. Lack of housing availability and affordability negatively impacts physical and mental health. Access to affordable housing enables residents to use their income on basic needs such as food and medical care, which can improve residents' health outcomes. HCWG has several project recommendations to further promote community health.

Criteria pollutants and greenhouse gas emissions may be generated during the proposed development. According to the Draft PEIR, such emissions may surpass acceptable thresholds and impacts would be "significant and unavoidable."[2] HCWG supports mitigation measures AQ/mm-3.1 - 3.3., which could reduce most construction and long-term operational emissions. HCWG further recommends electrification of all household appliances and installation of heat pumps in all residential units to serve as mitigation measures against long-term operational emissions. **HCWG-2**

HCWG is concerned about low-income housing units' proximity to highway 101, as serious adverse health effects are associated with long term exposure to traffic pollution. A 2017 California Air Resources Board publication suggests that people living as far as 1,000 feet from freeways may be susceptible to the effects of traffic pollution.[3] HCWG strongly recommends the installation of **HCWG-3**

The Healthy Communities Work Group aims to improve the health and wellness of all current and future San Luis Obispo County residents through collaboration, education, and policy guidance as it relates to the built environment.

high efficiency air filters within each unit to reduce possible effects from poor air quality. **HCWG-3 (cont'd)**

The Draft PIER states the proposed development may result in a cumulatively considerable impact to transportation and traffic. Such residual impacts would be "significant and unavoidable."[2] HCWG supports mitigation measures TR/mm-3.1, which could reduce emissions related to transportation and circulation. Implementing designated trails for non-motorized users encourages more active forms of transportation, such as walking and bicycling. Engaging in active transportation can reduce daily CO2 emissions associated with travel, as well as improve individual wellbeing.[4] HCWG supports bicycle racks being provided in open space, commercial, and residential development areas. **HCWG-4**

Thank you for the opportunity to review this project.

Kealoha Ghiglia, REHS
Chair, Healthy Communities Work Group

[1] SLO Health Counts (2019). *Community Health Improvement Plan*. Retrieved April 19th:https://www.slohealthcounts.org/content/sites/slodph/SLO_County_Community_Health_Improvement_Plan_2018-2023.pdf

[2.] County of San Luis Obispo.(2022). *Dana Reserve Specific Plan Environmental Impact Report*, *Executive Summary*. https://www.slocounty.ca.gov/Departments/Planning-Building/Forms-Documents/Planning-Projects/Dana-Reserve-Specific-Plan/Draft-Program-Environmental-Impact-Report/0-Executive-Summary.pdf

[3.] California Environmental Protection Agency. California Air Resources Board.(April 2017). *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways*.

[4.] Brand et al.(2021). The climate change mitigation effects of daily active travel in cities. Transportation Research Part D: Transport and Environment, 93(102764), https://doi.org/10.1016/j.trd.2021.102764

9.3.9.1 Response to Letter from Healthy Communities Work Group

Comment No.	Response
HCWG-1	The comment states that the Healthy Communities Work Group (HCWG) supports the project objectives to increase affordable housing unit production and allow accessory dwelling units. No changes to the environmental document are necessary in response to this comment.
HCWG-2	The comment supports Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and the requirement for electrification of all household appliances and installation of heat pumps in all residential units to serve as mitigation measures against long-term operational emissions. Mitigation measure AQ/mm-3.3 would require installation of electric fireplaces in place of residential wood-burning appliances and requires all built-in appliances to comply with California Title 20, Appliance Efficiency Regulation. The recently updated 2022 Building Energy Efficiency Standards (2022 Standards), which were approved in December 2021, encourage efficient electric heat pumps, establishes electric-ready requirements when natural gas is installed and to support the future installation of battery storage, and further expands solar PV and battery storage standards. No changes to the environmental document are necessary in response to this comment.
HCWG-3	The comment states that HCWG is concerned about low-income housing units' proximity to Highway 101, as serious adverse health effects are associated with long-term exposure to traffic pollution and recommends the installation of high efficiency air filters within each unit to reduce possible effects from poor air quality. As currently proposed, planned future residential development would primarily be located in excess of 500 feet from US 101. The planned future childcare center would also be located in excess of 500 feet of US 101. However, a small portion of planned multi-family residential units located within the northeastern and southeastern portion of the project site have the potential to be located within 500 feet of US 101. Since the exact development plan for future buildout of the Specific Plan Area is currently not known, depending on the land uses that are ultimately developed, other sensitive land uses, such as childcare centers, have the potential to be located within planned future commercial areas. Mitigation Measure AQ/mm-5.1 would require future development of sensitive land uses, including residential dwellings, childcare facilities, or other sensitive land uses, to be located a minimum of 500 feet from US 101, a distance recommended by the SLOAPCD. SLOAPCD has indicated that health risks associated with proximity to major roadways in San Luis Obispo County are not as concerning as more populated areas of the state (such as southern California). In addition, prevailing winds in San Luis Obispo County generally flow in an easterly direction, meaning areas west of the highway are at a further reduced risk of impacts related to proximity to freeway emissions. Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs. Mitigation Measure AQ/mm-5.1 requires that no sensitive land uses, including residential dwellings, be located within the 500-foot buffer unless a detailed Health Risk Assessment, approved by the SLOAPCD, documents that no significant health risks associated with proximity to US 101 would occur associated with the proposed development. Installation of high efficiency air filters are a common requirement of these types of Health Risk Assessments should any approved thresholds be exceeded. No changes to the environmental document are necessary in response to this comment.
HCWG-4	The comment states support for Mitigation Measure TR/mm-3.1 and other project components encouraging non-motorized travel. No changes to the environmental document are necessary in response to this comment.

9.3.10 Home Builders Association of the Central Coast

August 1, 2022

County of San Luis Obispo
Department of Planning and Building
Attn: Jennifer Guetschow
Sent via Email

Re: Dana Reserve EIR

Dear Jennifer Guetschow:

The HBA of the Central Coast supports projects like Dana Reserve that build responsible and desirable residential neighborhoods; add attainable, affordable and market rate housing; and integrate jobs, daycare, trails, parks, and open spaces. Every project requires some mitigation. We hope that you see the myriad of benefits outweigh the issues.

This project mitigation offers the means to promote both housing and reasonable conservation. It brings in water reliability for Nipomo residents. Being centrally located in our rural county, the commute to job centers would be minimal to San Luis Obispo, our coastal beach towns, and Santa Maria. While there would be trees removed, the proposed mitigation plants or preserves 4 to 5 times the number of trees it would remove. This meets and exceeds the County and CEQA guidelines. Water is important. Trees are important. Housing our county workforce is equally important. With the housing crisis (and related homelessness crisis) drastically affecting our state, county, and cities, we need satisfactory compromise to create more housing.

Every house built, adds more supply and houses more Californians. Increasing supply decreases housing demand, thereby lowering current non-sustainable and unaffordable housing prices. We ask you to consider these factors and approve projects like Dana Reserve.

HBA-1

Thank you.

Lindy Hatcher

Lindy Hatcher
Executive Director
Home Builders Association of the Central Coast
406-750-7682
LHatcher@hbacc.org

9.3.10.1 Response to Letter from Home Builders Association of the Central Coast

Comment No.	Response
HBA-1	The comment expresses support for the project and projects that build responsible and desirable residential neighborhoods; add attainable, affordable and market rate housing; and integrate jobs, daycare, trails, parks, and open spaces. The comment also points to the need to balance these benefits of the project with other adverse issues. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes in the environmental document are necessary in response to this comment.

9.3.11 Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law)

P: (626) 381-9248
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

August 1, 2022

Jennifer Guetschow
Project Manager
County of San Luis Obispo
976 Osos Street Room 300
San Luis Obispo, CA 93408
Em: jguetschow@co.slo.ca.us

RE: Draft Environmental Impact Report Dana Reserve Project Dana Reserve DEIR

Dear Jennifer Guetschow,

On behalf of the Southwest Regional Council of Carpenters ("**Southwest Carpenters**" or "**SWRCC**"), my Office is submitting these comments on the County of San Luis Obispo ("**County**" or "**Lead Agency**") Draft Environmental Impact Report ("**DEIR**") (SCH No. 2021060558) for the Dana Reserve Project ("**Project**").

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

SWRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the DEIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected

SWRCC-1

to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

SWRCC-1 (cont'd)

The City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

SWRCC-2

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

> . . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

SWRCC-2 (cont'd)

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions."[3]

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City "[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

labor-management training programs, . . ."[4] In addition, the City of Hayward requires all projects 30,000 square feet or larger to "utilize apprentices from state-approved, joint labor-management training programs."[5]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[6]

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.[7] Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

SWRCC-2 (cont'd)

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing." The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy

[4] City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf.

[5] City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

[6] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf.

[7] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

SWRCC-2 (cont'd)

The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals.

I. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations ("**CCR**" or "**CEQA Guidelines**") § 15002(a)(1).[8] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal. App. 4th 1344, 1354 (*"Berkeley Jets"*); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

SWRCC-3

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets,* 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to

[8] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 *et seq*, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position.' A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights,* 47 Cal. 3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131. As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

> A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449–450).

SWRCC-3 (cont'd)

B. Due to the COVID-19 Crisis, the City Must Adopt a Mandatory Finding of Significance that the Project May Cause a Substantial Adverse Effect on Human Beings and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[9]

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

SWRCC-4

In particular, based upon SWRCC's experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.

[9] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

SWRCC-4 (cont'd)

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[10]

SWRCC-4 (cont'd)

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

[10] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/wp-content/uploads/publications/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

..

II. THE DEIR IS INADEQUATE

A. The DEIR Fails to Support Its Findings with Substantial Evidence

When new information is brought to light showing that an impact previously discussed in the EIR but found to be insignificant with or without mitigation in the EIR's analysis has the potential for a significant environmental impact supported by substantial evidence, the EIR must consider and resolve the conflict in the evidence. See *Visalia Retail, L.P. v. City of Visalia* (2018) 20 Cal. App. 5th 1, 13, 17; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1109. While a lead agency has discretion to formulate standards for determining significance and the need for mitigation measures—the choice of any standards or thresholds of significance must be "based to the extent possible on scientific and factual data and an exercise of reasoned judgment based on substantial evidence. CEQA Guidelines § 15064(b); *Cleveland Nat'l Forest Found. v. San Diego Ass'n of Gov'ts* (2017) 3 Cal. App. 5th 497, 515; *Mission Bay Alliance v. Office of Community Inv. & Infrastructure* (2016) 6 Cal. App. 5th 160, 206. And when there is evidence that an impact could be significant, an DEIR cannot adopt a contrary finding without providing an adequate explanation along with supporting evidence. *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal. App. 5th 281, 302.

In addition, a determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance. In *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal. App. 4th 1, the court set aside an EIR for a statewide crop disease control plan because it did not include an evaluation of the risks to the environment and human health from the proposed program but simply presumed that no adverse impacts would occur from use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation. *See also Ebbetts Pass Forest Watch v Department of Forestry & Fire Protection* (2008) 43 Cal. App. 4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project).

SWRCC-5

1. *The DEIR Omits Critical Supporting Information regarding the Project's Noise Impact and Improperly finds that the Project's Noise Impact would be Less than Significant*

Environmental documents must provide technical details, not merely conclusory findings, to support their determinations. [A]n EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. CEQA Guidelines § 15147; *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1987) 193 Cal.App.3d 1544. 1549 ("All technical data, however, need not be included in the body of report, but may be relegated to appendices [citation omitted] or may be contained in separate source documents which are not formally a part of the document."). An EIR shall cite all documents used in its preparation . . . ." CEQA Guidelines § 15148. An environmental document may incorporate by reference another document so long as the document is made available for inspection to the public. CEQA Guidelines § 15150. **SWRCC-6**

The DEIR states that noise impact will be less than significant with mitigation. The DEIR states that the predicted traffic noise for the easternmost portion would exceed the County's exterior noise standard of 60dBA. However, the DEIR does not state what the noise level at that portion is. The modeling provided by the DEIR is 70, 65 or 60 dBA. But without knowing how much, it would be difficult to reach the conclusion that the mitigation would be less than significant. **SWRCC-7**

2. *The DEIR Fails to Consider all Feasible Mitigations for Transportation Impacts*

An EIR must identify describe mitigation a proposed project's potentially significant environmental impacts. PRC § 21002.1(a); 21081(a)(1). A project's environmental impacts must be mitigated to a less than significant level or at the least, adopt all feasible mitigation to avoid a project's significant environmental impacts. PRC §§ 21002.1(b), 21081(a)91); CEQA Guidelines § 15021(a)(2 – 3), 15091(a)(1). **SWRCC-8**

CEQA Guidelines section 15064.3(b) requires analysis of a Project's vehicle miles traveled (VMT) impacts as part of the environmental document's transportation impacts analysis. A lead agency must support its findings with substantial evidence,

which includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." CEQA Guidelines § 15384(b). SWRCC-8 (cont'd)

The DEIR states the cumulative VMT with the project would have a VMT of 27 which is well above the San Luis Obispo County threshold of 25.7. The DEIR considers moves to lower the VMT such as pedestrian and bicycle networks as well as offering carpool for trip reductions. However, the DEIR states that even with all feasible VMT reduction measures, the project could not be less than significant. However, the DEIR fails to consider such feasible measures such as VMT bank mitigations. As such the DEIR should be recirculated with more considerations. SWRCC-9

The DEIR both fails CEQA's informational requirements, failing to analyze potential mitigation measures, but also CEQA's substantive requirements that all feasible mitigation measures be adopted. For example, in April of 2020, Fehr & Peers (who happens to be a technical consultant on this particular environmental document) and the Western Riverside Council of Governments ("WRCOG") published "VMT Mitigation Through Fees, Banks & Exchanges: Understanding New Mitigation Approaches."[11] SWRCC-10

Oddly enough, the DEIR fails to consider any of the mitigation approaches. WRCOG proposes a number of regional VMT mitigation strategies including VMT-based Transportation Impact Fees, VMT Mitigation Exchanges and VMT Mitigation Banks.[12] These approaches are well documented and have already adopted in a number of jurisdictions, including in WRCOG which the City is a member agency of.[13]

In addition, there are many well-documented project level VMT mitigation strategies, none of which are discussed as potential mitigation measures in the DEIR. Fehr & Peers in another study conducted for WRCOG suggested a number of project-level VMT mitigation measures that would be effective in rural or suburban settings such as SWRCC-11

[11] Western Riverside Council of Governments (2020) VMT Mitigation Through Fees, Banks & Exchanges, Understanding New Mitigation Approaches, *available at* https://www.fehrandpeers.com/wp-content/uploads/2020/04/VMT-Fees_Exchanges_Banks-White-Paper_Apr2020.pdf.

[12] *Id.* at pp. 16 – 17.

[13] Neil Peacock, Senior Environmental Planner, Caltrans (2017) Working Paper: The Potential for Regional Transportation Impact Mitigation Fee Programs and Mitigation Banks to Help Streamline the Implementation of SB 743 at pp. 2 – 3, *available at* https://static1.squarespace.com/static/5b96d09a3c3a53da0e1ba210/t/5e5ec5cf5876f47000915ddd/1583269327880/VMT+Mitigation+Precedents+Peacock+March+2017.pdf

in Cities in the WRCOG, including diversifying land uses, providing pedestrian network improvements, and traffic calming measures among many other proposals.[14]

SWRCC-11 (cont'd)

Finally, as stated previously, local skilled and trained workforce requirements can also significantly reduce vehicle miles traveled and associated air pollutant emissions.

SWRCC-12

The DEIR needs to be revised to reflect substantive consideration of the many measures available to mitigate transportation impacts, including the use of local skilled professions on all construction projects, not just the handful of measures selected for discussion in the DEIR. Furthermore, the DEIR must be revised to require the application all feasible measures to reduce the Project's significant transportation impacts.

SWRCC-13

3. *The DEIR's Air Quality Mitigation Fails to Consider All Feasible Mitigations*

The DEIR states the operational emissions for the Project of ROG and NO_x would be 144.9. The DEIR also states the SLOAPCD Significance Threshold is 25. While the DEIR does admit the daily operations emissions is significant and unavoidable, this is still almost six times the threshold. While the DEIR states a series of mitigations such as installation of suppressants, it fails to consider a reduction in size of the Project as a method to reduce ROG and NO_x impacts.

SWRCC-14

II. THE PROJECT VIOLATES THE STATE PLANNING AND ZONING LAW AS WELL AS THE CITY'S GENERAL PLAN

A. Background Regarding the State Planning and Zoning Law

Each California city and county must adopt a comprehensive, long-term general plan governing development. *Napa Citizens for Honest Gov. v. Napa County Bd. of Supervisors* (2001) 91 Cal. App.4th 342, 352, citing Gov. Code §§ 65030, 65300. The general plan sits at the top of the land use planning hierarchy (See *DeVita v. County of Napa* (1995) 9 Cal. App. 4th 763, 773), and serves as a "constitution" or "charter" for all future development. *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal. App. 3d 531, 540.

SWRCC-15

[14] Technical Memorandum from Ronald T. Milam, AICP, PTP and Jason Pack, PE to Chris Gray (WRCOG), Chris Tzeng (WRCOG), Sarah Dominguez (SCAG) and Mike Gainor (SCAG) (February 26, 2019) SB 743 Implementation TDM Strategy Assessment, *available at* https://www.fehrandpeers.com/wp-content/uploads/2019/12/TDM-Strategies-Evaluation.pdf

General plan consistency is "the linchpin of California's land use and development laws; it is the principle which infused the concept of planned growth with the force of law." See *Debottari v. Norco City Council* (1985) 171 Cal. App. 3d 1204, 1213.

State law mandates two levels of consistency. First, a general plan must be internally or "horizontally" consistent: its elements must "comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." (See Gov. Code § 65300.5; *Sierra Club v. Bd. of Supervisors* (1981) 126 Cal. App. 3d 698, 704.) A general plan amendment thus may not be internally inconsistent, nor may it cause the general plan as a whole to become internally inconsistent. See *DeVita*, 9 Cal. App. 4th at 796 fn. 12.

Second, state law requires "vertical" consistency, meaning that zoning ordinances and other land use decisions also must be consistent with the general plan. (See Gov. Code § 65860(a)(2) [land uses authorized by zoning ordinance must be "compatible with the objectives, policies, general land uses, and programs specified in the [general] plan."]; see also *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal. App. 3d 1176, 1184.) A zoning ordinance that conflicts with the general plan or impedes achievement of its policies is invalid and cannot be given effect. See *Lesher*, 52 Cal. App. 3d at 544.

SWRCC-15 (cont'd)

State law requires that all subordinate land use decisions, including conditional use permits, be consistent with the general plan. See Gov. Code § 65860(a)(2); *Neighborhood Action Group*, 156 Cal. App. 3d at 1184.

A project cannot be found consistent with a general plan if it conflicts with a general plan policy that is "fundamental, mandatory, and clear," regardless of whether it is consistent with other general plan policies. See *Endangered Habitats League v. County of Orange* (2005) 131 Cal. App. 4th 777, 782-83; *Families Unafraid to Uphold Rural El Dorado County v. Bd. of Supervisors* (1998) 62 Cal. App. 4th 1332, 1341-42 ("*FUTURE*").

Moreover, even in the absence of such a direct conflict, an ordinance or development project may not be approved if it interferes with or frustrates the general plan's policies and objectives. See *Napa Citizens*, 91 Cal. App. 4th at 378-79; see also *Lesher*, 52 Cal. App. 3d at 544 (zoning ordinance restricting development conflicted with growth-oriented policies of general plan).

1. *The DEIR is Required to Review the Project's Consistency with Regional Housing Plans, Sustainable Community Strategy and Regional Transportation Plans*

CEQA Guidelines section 15125(d) requires that an environmental document "discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. *See also Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal. App. 5th 467, 543. The DEIR should thoroughly evaluate the consistency of this Project with the City's General Plan, City's Regional Housing Needs Assessment targets, Sustainable Community Strategy and Regional Transportation Plan. The DEIR fails to analyze the Project's consistency with any of these applicable plans.

SWRCC-16

III. CONCLUSION

SWRCC request that the City revise and recirculate the DEIR for public comment to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office.

SWRCC-17

Sincerely,



Mitchell M. Tsai
Attorneys for Southwest Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

SWRCC-18

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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March 8, 2021

Mitchell M. Tsai
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Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

SWRCC-18 (cont'd)

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

SWRCC-18 (cont'd)

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

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number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin

Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

SWRCC-18 (cont'd)

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

3

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

SWRCC-18 (cont'd)

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

SWRCC-18
(cont'd)

Attachment A

Location Type	Location Name	Rural H-W (miles)	Urban H-W (miles)
Air Basin	Great Basin	16.8	10.8
Air Basin	Lake County	16.8	10.8
Air Basin	Lake Tahoe	16.8	10.8
Air Basin	Mojave Desert	16.8	10.8
Air Basin	Mountain	16.8	10.8
Air Basin	North Central	17.1	12.3
Air Basin	North Coast	16.8	10.8
Air Basin	Northeast	16.8	10.8
Air Basin	Sacramento	16.8	10.8
Air Basin	Salton Sea	14.6	11
Air Basin	San Diego	16.8	10.8
Air Basin	San Francisco	10.8	10.8
Air Basin	San Joaquin	16.8	10.8
Air Basin	South Central	16.8	10.8
Air Basin	South Coast	19.8	14.7
Air District	Amador County	16.8	10.8
Air District	Antelope Valley	16.8	10.8
Air District	Bay Area AQMD	10.8	10.8
Air District	Butte County	12.54	12.54
Air District	Calaveras	16.8	10.8
Air District	Colusa County	16.8	10.8
Air District	El Dorado	16.8	10.8
Air District	Feather River	16.8	10.8
Air District	Glenn County	16.8	10.8
Air District	Great Basin	16.8	10.8
Air District	Imperial County	10.2	7.3
Air District	Kern County	16.8	10.8
Air District	Lake County	16.8	10.8
Air District	Lassen County	16.8	10.8
Air District	Mariposa	16.8	10.8
Air District	Mendocino	16.8	10.8
Air District	Modoc County	16.8	10.8
Air District	Mojave Desert	16.8	10.8
Air District	Monterey Bay	16.8	10.8
Air District	North Coast	16.8	10.8
Air District	Northern Sierra	16.8	10.8
Air District	Northern	16.8	10.8
Air District	Placer County	16.8	10.8
Air District	Sacramento	15	10

SWRCC-18
(cont'd)

Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne	16.8	10.8
Air District	Ventura County	16.8	10.8
Air District	Yolo/Solano	15	10
County	Alameda	10.8	10.8
County	Alpine	16.8	10.8
County	Amador	16.8	10.8
County	Butte	12.54	12.54
County	Calaveras	16.8	10.8
County	Colusa	16.8	10.8
County	Contra Costa	10.8	10.8
County	Del Norte	16.8	10.8
County	El Dorado-Lake	16.8	10.8
County	El Dorado-	16.8	10.8
County	Fresno	16.8	10.8
County	Glenn	16.8	10.8
County	Humboldt	16.8	10.8
County	Imperial	10.2	7.3
County	Inyo	16.8	10.8
County	Kern-Mojave	16.8	10.8
County	Kern-San	16.8	10.8
County	Kings	16.8	10.8
County	Lake	16.8	10.8
County	Lassen	16.8	10.8
County	Los Angeles-	16.8	10.8
County	Los Angeles-	19.8	14.7
County	Madera	16.8	10.8
County	Marin	10.8	10.8
County	Mariposa	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Merced	16.8	10.8
County	Modoc	16.8	10.8
County	Mono	16.8	10.8
County	Monterey	16.8	10.8
County	Napa	10.8	10.8

SWRCC-18
(cont'd)

County	Nevada	16.8	10.8
County	Orange	19.8	14.7
County	Placer-Lake	16.8	10.8
County	Placer-Mountain	16.8	10.8
County	Placer-	16.8	10.8
County	Plumas	16.8	10.8
County	Riverside-	16.8	10.8
County	Riverside-	19.8	14.7
County	Riverside-Salton	14.6	11
County	Riverside-South	19.8	14.7
County	Sacramento	15	10
County	San Benito	16.8	10.8
County	San Bernardino-	16.8	10.8
County	San Bernardino-	19.8	14.7
County	San Diego	16.8	10.8
County	San Francisco	10.8	10.8
County	San Joaquin	16.8	10.8
County	San Luis Obispo	13	13
County	San Mateo	10.8	10.8
County	Santa Barbara-	8.3	8.3
County	Santa Barbara-	8.3	8.3
County	Santa Clara	10.8	10.8
County	Santa Cruz	16.8	10.8
County	Shasta	16.8	10.8
County	Sierra	16.8	10.8
County	Siskiyou	16.8	10.8
County	Solano-	15	10
County	Solano-San	16.8	10.8
County	Sonoma-North	16.8	10.8
County	Sonoma-San	10.8	10.8
County	Stanislaus	16.8	10.8
County	Sutter	16.8	10.8
County	Tehama	16.8	10.8
County	Trinity	16.8	10.8
County	Tulare	16.8	10.8
County	Tuolumne	16.8	10.8
County	Ventura	16.8	10.8
County	Yolo	15	10
County	Yuba	16.8	10.8
Statewide	Statewide	16.8	10.8

SWRCC-18
(cont'd)

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Mininum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

SWRCC-18
(cont'd)

Attachment B

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	5.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9078	52.9078	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6826**	**1,721.6826**	**0.1294**	**0.0000**	**1,724.9187**

SWRCC-18 (cont'd)

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6823**	**1,721.6823**	**0.1294**	**0.0000**	**1,724.9183**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2021	11-30-2021	1.4103	1.4103
2	12-1-2021	2-28-2022	1.3613	1.3613
3	3-1-2022	5-31-2022	1.1985	1.1985
4	6-1-2022	8-31-2022	1.1921	1.1921
5	9-1-2022	11-30-2022	1.1918	1.1918
6	12-1-2022	2-28-2023	1.0774	1.0774
7	3-1-2023	5-31-2023	1.0320	1.0320
8	6-1-2023	8-31-2023	1.0260	1.0260

SWRCC-18 (cont'd)

9	**9-1-2023**	**11-30-2023**	1.0265	1.0265
10	**12-1-2023**	**2-29-2024**	2.8857	2.8857
11	**3-1-2024**	**5-31-2024**	1.6207	1.6207
		Highest	2.8857	2.8857

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

SWRCC-18 (cont'd)

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.646 5	2,512.646 5	0.1037	0.0215	2,521.635 6
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.646 5	2,512.646 5	0.1037	0.0215	2,521.635 6
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.426 7	1,383.426 7	0.0265	0.0254	1,391.647 8
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.426 7	1,383.426 7	0.0265	0.0254	1,391.647 8

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.04608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

SWRCC-18 (cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.04608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

SWRCC-18 (cont'd)

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

SWRCC-18 (cont'd)

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

SWRCC-18 (cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

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(cont'd)

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42627 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

SWRCC-18 (cont'd)

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42627 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

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Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

SWRCC-18
(cont'd)

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

SWRCC-18 (cont'd)

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	5.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1521
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1520
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

SWRCC-18 (cont'd)

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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(cont'd)

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

SWRCC-18 (cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day															
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day															
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

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(cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	5.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

SWRCC-18 (cont'd)

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

SWRCC-18 (cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

SWRCC-18 (cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6554**	**1,418.6554**	**0.1215**	**0.0000**	**1,421.6925**

SWRCC-18 (cont'd)

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6354	44.6354	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6550**	**1,418.6550**	**0.1215**	**0.0000**	**1,421.6921**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2021	11-30-2021	1.4091	1.4091
2	12-1-2021	2-28-2022	1.3329	1.3329
3	3-1-2022	5-31-2022	1.1499	1.1499
4	6-1-2022	8-31-2022	1.1457	1.1457
5	9-1-2022	11-30-2022	1.1415	1.1415
6	12-1-2022	2-28-2023	1.0278	1.0278
7	3-1-2023	5-31-2023	0.9868	0.9868
8	6-1-2023	8-31-2023	0.9831	0.9831

SWRCC-18 (cont'd)

9	**9-1-2023**	**11-30-2023**	0.9798	0.9798
10	**12-1-2023**	**2-29-2024**	2.8757	2.8757
11	**3-1-2024**	**5-31-2024**	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

SWRCC-18 (cont'd)

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18 (cont'd)

CalEEMod Version: CalEEMod.2016.3.2 Page 31 of 44 Date: 1/12/2021 2:26 PM

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.646 5	2,512.646 5	0.1037	0.0215	2,521.635 6
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.646 5	2,512.646 5	0.1037	0.0215	2,521.635 6
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.426 7	1,383.426 7	0.0265	0.0254	1,391.647 8
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.426 7	1,383.426 7	0.0265	0.0254	1,391.647 8

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

SWRCC-18 (cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

SWRCC-18 (cont'd)

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

SWRCC-18 (cont'd)

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

SWRCC-18 (cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

SWRCC-18
(cont'd)

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42627 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

SWRCC-18 (cont'd)

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42627 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

SWRCC-18
(cont'd)

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

SWRCC-18 (cont'd)

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0956
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

SWRCC-18 (cont'd)

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

SWRCC-18 (cont'd)

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

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(cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day													lb/day		
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

SWRCC-18 (cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

SWRCC-18 (cont'd)

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

SWRCC-18 (cont'd)

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

SWRCC-18 (cont'd)

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

SWRCC-18 (cont'd)

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

SWRCC-18 (cont'd)

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

SWRCC-18 (cont'd)

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

SWRCC-18 (cont'd)

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

SWRCC-18 (cont'd)

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

SWRCC-18 (cont'd)

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

SWRCC-18 (cont'd)

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

SWRCC-18 (cont'd)

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

SWRCC-18
(cont'd)

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

SWRCC-18 (cont'd)

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0290	595.0290	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

SWRCC-18 (cont'd)

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

SWRCC-18 (cont'd)

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

SWRCC-18 (cont'd)

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Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWRCC-18
(cont'd)

Attachment C

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

SWRCC-18
(cont'd)

SWRCC-18
(cont'd)

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
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Office: (310) 452-5555
Fax: (310) 452-5550
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

SWRCC-18 (cont'd)

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

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Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

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Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

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Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

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Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

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Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

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Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

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Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

SWRCC-18 (cont'd)

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

SWRCC-18
(cont'd)

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

SWRCC-18
(cont'd)

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

SWRCC-18
(cont'd)

SWRCC-18
(cont'd)

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Santa Monica, California 90401
Tel: (949) 887-9013
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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

SWRCC-18
(cont'd)

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

SWRCC-18
(cont'd)

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

SWRCC-18
(cont'd)

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

SWRCC-18
(cont'd)

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

SWRCC-18
(cont'd)

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

SWRCC-18
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Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

SWRCC-18
(cont'd)

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

SWRCC-18
(cont'd)

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

SWRCC-18
(cont'd)

9.3.11.1 Response to Letter from Southwest Regional Council of Carpenters (via Mitchell M. Tsai, Attorney at Law)

Comment No.	Response
SWRCC-1	The comment states that the Southwest Regional Council of Carpenters (SWRCC) background and requests notice of actions related to the project. No changes in the environmental document are necessary in response to this comment.
SWRCC-2	The comment suggests the County should require the applicant to provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the project. As described in Section 4.14 of the EIR, construction jobs are anticipated to be served by the local construction workforce. The project does not propose unique components or construction activities that would likely require a specialized or unique workforce that is located outside of the County. Use of a localized workforce would both reduce greenhouse gas emissions and provide local economic benefit, as stated in this comment. No changes to the EIR are necessary.
SWRCC-3	The comment summarizes the basic purposes of CEQA to provide public agencies and the public with information about potential environmental effects. No changes to the environmental document are necessary in response to this comment.
SWRCC-4	The comment states that the City must adopt a mandatory finding of significance that the project may cause a substantial adverse effect on human beings and mitigate COVID-19 impacts. A global pandemic is not an environmental impact and would not result in adverse physical changes to the environment. No changes to the environmental document are necessary in response to this comment.
SWRCC-5	The comment states that the DEIR fails to support its findings with substantial evidence and provides background information related to the requirements of CEQA but does not specify which information, analysis, or findings included in the DEIR is not supported by substantial evidence. No changes in the environmental document are necessary in response to this comment.
SWRCC-6	The comment states that the DEIR omits critical supporting information regarding the project's noise impact and improperly finds that the project's noise impact would be less than significant. Please refer to response to comment SWRCC-7.
SWRCC-7	The comment states that the DEIR does not state what the noise level is at the easternmost portion of the site. Predicted future noise levels along the eastern portion of the project site are depicted on Figure 4 of the Noise Impact Assessment prepared for the project (refer to Appendix I). As noted, the predicted 70, 65, and 60 dBA CNEL noise contours would extend to approximately 220 feet, 468 feet, and 1,005 feet from the centerline of US 101, respectively. Predicted noise levels at some proposed noise-sensitive land uses located within these projected noise contours could potentially exceed the County's applicable noise standards for determination of land use compatibility. Mitigation Measure N/mm-1.2 would require acoustical assessments to be prepared as part of the County development review process for future noise-sensitive land uses when design details for those future uses are known (building orientation, outdoor vs. indoor areas, contours, screening). Where the acoustical assessment determines predicted noise levels would exceed applicable standards, noise-mitigation measures would be required sufficient to ensure compliance with County noise standards. Such measures may include, but are not limited to, incorporation of setbacks, sound barriers, or berms. No changes to the environmental document are necessary in response to this comment.
SWRCC-8	The comment states that the DEIR fails to consider all feasible mitigations for transportation impacts and provides supporting CEQA legislation. Please refer to response to comments SWRCC-9 through SWRCC-12. No changes to the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
SWRCC-9	The comment states that the DEIR fails to consider such feasible mitigation measures such as VMT bank mitigations and, as such, the DEIR should be recirculated with more considerations. Refer to response to comment SWRCC-10.
SWRCC-10	The comment states that the DEIR fails CEQA's information requirements, failing to analyze potential mitigation measures, but also fails CEQA's substantive requirements that all feasible mitigation measures be adopted. All feasible VMT reduction measures have been incorporated into mitigation measures for the project per recognized state and local guidance. Fehr & Peers is, to the EIR preparers knowledge, not associated with this project. Therefore, this comment may relate to a different project.
SWRCC-11	The comment appears to relate to the Western Riverside Council of Governments and potentially the City of Riverside. No changes to the environmental document are necessary in response to this comment.

Comment No.	Response
SWRCC-12	The comment states that local skilled and trained workforce requirements can also significantly reduce VMT and associated air pollutant emissions. Please refer to response to comment SWRCC-2.
SWRCC-13	The comment reiterates previous comments. Refer to response to comments SWRCC-9 through SWRCC-12. No changes to the environmental document are necessary in response to this comment.
SWRCC-14	The comment states that the DEIR fails to consider a reduction in size of the project as a method to reduce ROG and NOx impacts. As discussed in Chapter 5, *Alternatives Analysis*, several alternatives were considered which would reduce the size of the project and result in reduced air quality impacts compared to the proposed project. No changes to the environmental document are necessary in response to this comment.
SWRCC-15	The comment provides background CEQA information regarding conflicts with general plan policy. No changes in the environmental document are necessary in response to this comment. Refer also to Section 2.5.4 of the EIR, which describes the proposed General Plan Amendment being processed concurrently with the DRSP.
SWRCC-16	The comment states the DEIR is required to review the project's consistency with regional housing plans, sustainable community strategy and regional transportation plans. The DEIR includes analysis of the project's consistency with applicable housing plans in Section 4.11, *Land Use and Planning*, and Section 4.14, *Population and Housing.* The DEIR includes an analysis of the project's consistency with the sustainable community strategy in Section 4.3, *Air Quality,* Section 4.8, *Greenhouse Gas Emissions*, Section 4.11, *Land Use and Planning*, and Section 4.14, *Population and Housing.* The DEIR includes analysis of the project's consistency with regional transportation plans in Section 4.11, *Land Use and Planning*, and Section 4.17, *Transportation*. No changes to the environmental document are necessary in response to this comment.
SWRCC-17	The comment requests that the City revise and recirculate the DEIR for public comment to address the aforementioned concerns. Please refer to response to comments SWRCC-1 through SWRCC-16. No changes to the environmental document are necessary in response to this comment.
SWRCC-18	The comment has included Local Hire Requirements and Considerations for Greenhouse Gas Modeling for reference. No changes to the environmental document are necessary in response to this comment.

9.3.12 Environmental Center of San Luis Obispo

Mail: P.O. Box 1014
San Luis Obispo, CA 93406
Office: 1012 Pacific St., Ste B-1
San Luis Obispo, CA 93401

ENVIRONMENTAL CENTER
OF SAN LUIS OBISPO

Phone: (805) 544-1777
Email: info@ecoslo.org
Online: www.ECOSLO.org

Protecting and preserving San Luis Obispo County's natural environment since 1971

To Whom It May Concern,

As a representative of the Environmental Center of San Luis Obispo (ECOSLO), I am writing in regards to the Draft Environmental Impact Report (DPEIR) SCH#2021060558 for the Dana Reserve Specific Plan. ECOSLO is greatly concerned about the potential significant and unavoidable impacts of this Project. The proposed 1,289 residential units and 110,000-203,000 sq. ft. of commercial development on a 288-acres on the Nipomo Mesa would bring with it numerous significant and unavoidable impacts while pushing forward with what we consider to be environmentally irresponsible development practices. **ECOSLO-1**

Chief among the impacts listed in the DEIR are the significant and unavoidable impacts to special-status plant and wildlife species. The proposed removal of 3,943 oak trees within the Project area would impact 21.7 acres of coast live oak forest and 75.3 acres of coast live oak woodland (97 acres total). Even with the proposed mitigation the DEIR still notes that the removal is, "*a significant net loss of oak trees and acreage of oak woodlands in the county*." The same can be said of the project's impacts to the Burton Mesa Chaparral. The Burton Mesa Chaparral is one of the rarest natural communities throughout San Luis Obispo county, and one that is rapidly disappearing on the Nipomo Mesa. As with the proposed removal of oak trees, the DEIR notes that even with the mitigation put forward, "*the limited availability of off-site mitigation parcels and the limited on-site opportunities to restore and maintain the ecological integrity of this ecosystem, potential impacts would be significant and unavoidable*." But these are not the only impacts ECOSLO is concerned about. The DEIR also lists significant and unavoidable impacts to Air Quality, Greenhouse Gas (GHG) Emissions, Land Use, Population and Housing, Transportation, and Growth-Inducement. **ECOSLO-2**

While ECOSLO understands the importance of increased housing supply, we firmly believe that this Project does not meet the principles of what we consider to be responsible development. The proposal is not focused on limiting urban sprawl, respecting historic and cultural resources, and reducing our impact on the natural world. Of the alternatives put forward in the DEIR, ECOSLO supports moving forward with the Environmentally Superior Alternative of Alternative 3, the Residential Rural Cluster Subdivision alternative. While it may not meet the County's housing supply goals, it would reduce impacts related to Biological Resources, GHG Emissions, Land Use and Planning, Population and Housing, and Public Services. **ECOSLO-3**

Residents of San Luis Obispo County should not have to choose between increasing suburban sprawl and affordable housing, and we are disappointed that this Project asks that we do so once again. We hope that the County takes these concerns into account and thank you for your time and attention to this matter. **ECOSLO-4**

Regards,

Grant Helete, Community Organizer
ECOSLO - Environmental Center of San Luis Obispo

9.3.12.1 Response to Letter from Environmental Center of San Luis Obispo

Comment No.	Response
ECOSLO-1	The comment states that the Environmental Center of San Luis Obispo (ECOSLO) believes the project would bring numerous significant and unavoidable impacts while pushing forward environmentally irresponsible development practices. These impacts are identified in the EIR. No changes to the environmental document are necessary in response to this comment.
ECOSLO-2	The comment expresses concern regarding the significant and unavoidable impacts identified for the removal of oak trees, coast live oak forest, coast live oak woodland, Burton Mesa chaparral, air quality, greenhouse gas emissions, land use, population and housing, transportation, and growth inducement. These impacts are identified in the EIR. No changes to the environmental document are necessary in response to this comment.
ECOSLO-3	The comment states that ECOSLO understands the importance of increased housing supply but believes this project does not meet the principles of responsible development and suggests support for the Environmentally Superior Alternative (Alternative 3). No changes to the environmental document are necessary in response to this comment.
ECOSLO-4	The comment asserts that residents of San Luis Obispo County should not have to choose between increasing suburban sprawl and affordable housing. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative. No changes to the environmental document are necessary in response to this comment.

9.3.13 Northern Chumash Tribal Council

Northern Chumash Tribal Council
A Native American Corporation
PO Box 6533, CA 93412 (805) 356-6149

CHUMASH HERITAGE
National Marine Sanctuary

County of San Luis Obispo
Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

The Northern Chumash Tribal Council (NCTC; the Tribe) submits the following comments on the Cultural Resources and Tribal Cultural Resources sections of the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (the Project). In general, we find these sections of the DEIR are poorly written and demonstrate a general lack of familiarity with the local resources. Many of their conclusions and recommendations aren't substantiated with facts or reasonable assumptions based on facts. Moreover, the requirements of CEQA regarding the evaluation of California Register of Historic Places (CRHR) eligibility, impact assessment, and mitigation are skirted or ignored outright.

Section 4.5.1, Existing Conditions

The section does not demonstrate any understanding of the local history, prehistory, or archaeology which is the necessary context for the assessment of impacts on sites in the Project area. It completely ignores the Chumash history of Nipomo and lacks any discussion of local sites of importance to which the resources in the Project area may be related. The ethnographic overview even fails to mention the most relevant Chumash place in the region, *Nipumu*, the Northern Chumash village for which the current town of Nipomo is named. This is a substantial oversight that demonstrates the lack of knowledge regarding the study area. CA-SLO-809, the archaeological site associated with that village, is less than a mile away from the Project and should have been mentioned as the most substantial and well-known site in the area, even though it's beyond the arbitrary quarter-mile radius of the records search. The excavation at CA-SLO-809 is still the most substantial excavation in the local area; its findings provide the basis for the local prehistoric cultural sequence and should have been referenced in the overview section. Another omission has to do with the well-known discovery of a Clovis point in the hills surrounding the valley, substantiating the Late Paleoindian use of the area. NCTC-1 NCTC-2 NCTC-3

The Euro-American history of Nipomo is simply glossed over as well. There is no historical overview, even though the ranching history of the area is mentioned in passing and one historical archaeological site was identified in the project area. The Dana Rancho gets no mention anywhere, a considerable oversight since it provides critical historical context for the study area (and considering the Project name), even if the Adobe itself is more than 0.25 miles distant. In general, this section is poorly written, sloppy, and internally inconsistent. In addition to the omissions already noted, it also contains factual errors. For example, Mission San Fernando Rey is not in the Chumash territory, as stated on pages 4.5-2; it is in the Tataviam/Gabrielino area. NCTC-4 NCTC-5 NCTC-6

Section 4.5.13, Existing Cultural Resources

The DEIR glosses over the history of the project area and writes off one site (P-40-002271) as insignificant because it is "undoubtedly historic" (pg 4.5.2-8) without providing evidence or explaining how they determined its age or reached this judgment regarding its significance. This information should be provided. Given the proximity of the Dana Adobe and the known historic uses of the area, this judgment should be reconsidered (or at least better supported). NCTC-7

Since all these sites seem to contain marine shells that can be dated using radiocarbon, please explain why that wasn't done. Such dating would have helped in evaluating the eligibility of these sites for the CRHR and assessing potential Project impacts. NCTC-8

It does not appear that there has been any study of the proposed offsite conservation area/mitigation lands over in the hills on the other side of the valley. This area is part of the Project and should have been studied at the same level. In our experience, there are activities related to biological mitigation, water and range management, and other activities that could occur on these lands and would definitely impact any cultural resources present. NCTC-9

Section 4.5.1.3.2, Native American Coordination

This section refers to a positive response from the Native American Heritage Commission (NAHC) but there was no effort to identify the nature or location of sacred lands in the Project area so they could be protected. The reader is referred to Section 4.18 for a description of tribal consultation, but that section doesn't discuss sacred lands and the NAHC response was not disclosed to NCTC or other tribal consultants. We received no response to our additional inquiries to the County about this matter. For these and other reasons, consultation is not completed to our satisfaction. If there are identified sacred sites they have to be considered in the early planning stages so they can be respected and protected. The County should require an ethnohistoric study to identify sacred sites so Project impacts can be identified and mitigated. NCTC-10

Section 4.5.4, Impact Assessment and Methodology

The County will assume that archaeological sites DR-001, P-40-2132, and P-40-2273 are eligible for the California Register for the purposes of the project, and are thus historical resources under CEQA, but the DEIR does not explain what qualities these sites have that would make them CRHR-eligible (Section 4.5.4, pp 4.5-16). Please provide this information. NCTC-11

The DEIR avers that this assumption is based on the results of the Extended Phase 1 (XP1) investigation, but the XP1 study was only intended to define the vertical and horizontal extent of identified archaeological resources (i.e., the boundaries of the archaeological sites—see Morgan Bird's 12-13-21 letter report to Senior Planner Jennifer Guetschow). The XP1 was helpful in defining the structure and content of the resources but does not constitute a significant evaluation, which is necessary at this point. This is a critical omission since it is NCTC-12

the Project's effects on those significant qualities of the sites that determine whether an impact is significant. How is the Tribe or the public judge the validity of the County's assumptions or the efficacy of the proposed mitigation without this critical missing information? Please explain why the cultural resources in the Project area were not evaluated for significance. This deficiency must be remedied in order to adequately determine the age of the cultural resources, identify their function(s), define the qualities that make the sites significant and justify recommendations regarding significance, avoidance, and other mitigation measures.

NCTC-12 (cont'd)

A letter to your department dated 12-13-21 from Cultural Resource Specialist Morgan Bird refers to a subsequent "comprehensive technical report." This report has not been supplied to the Tribe, and we request that it be provided now and that the comment period on the DEIR be extended for 30 days from our receipt of said document to allow us additional time for review and comment.

NCTC-13

Section 4.5.5, Project-Specific Impacts and Mitigation Measures

Mitigation measures (MM) CR/mm-1.1 and -3.1 delay environmental review of off-site improvements and defer identification of impacts and MMs to some future unspecified time. They declare that unidentified historical and archaeological resources could be impacted but that those impacts would be less than significant with mitigation. However, these mitigation measures only require preparation of reports and do not specify that resources shall be avoided, or other mitigation. It is improper and inconsistent with CEQA requirements to rely on a future plan or report without additional public review as mitigation now. It is not necessary to know the "precise location" of the offsite improvements. A general area for these potential effects should be identified now, and the architectural/historical/archaeological studies should be completed and reported in the EIR so that design changes can be implemented to avoid any significant resources.

NCTC-14

Please clarify whether the known archaeological sites shall be avoided or not? The EIR uses squishy language. CR/mm-2.1 says the parts of the sites found to contain subsurface deposits "shall be avoided." But then CR/mm-2.2 says, essentially, "oh that's okay, if we can't we'll do data recovery." Which is it, who decides, and when, and what are the circumstances that would preclude avoidance? None of this is specified, as it must be.

NCTC-15

Since data recovery through excavation is not the only feasible mitigation for the impacts of this Project, the EIR must explain why avoidance and preservation in place are not feasible or why other measures better mitigate the impacts.

NCTC-16

The DEIR notes that subsurface archaeological deposits exist in some small areas, and those areas are "potentially significant." These small areas where they identified subsurface layers are to be protected as ESAs, but the areas are not specified and we're not told where we can find that information, even if it's confidential and controlled. The Tribe requests detailed maps showing the locations of all proposed ESAs, and further requests that the comment period of the DEIR be extended for 30 days following receipt of those maps to allow sufficient time for review and comment.

NCTC-17

The argument that surface deposits without identified subsurface components are not eligible for the CRHR is based on a highly contingent set of assumptions that are not specified in the DEIR and requires substantiation, which might well have been obtained if a realistic program of site testing and evaluation had been carried out. Without meaningful testing results, however, such a conclusion is not justified. For example, a sparse surface deposit that is 8-10,000 years old might well be judged significant, while a similar deposit of only 500 years might not. Since we know that sites of Clovis age (as much as 12,000 years old) exist in the Nipomo area, it is premature to disregard these sparse surface deposits. **NCTC-18**

Regarding CR/mm-2.2, what does it mean to say "The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any)"? First of all, if there's no physical disturbance why do data recovery? But more importantly, data recovery should be tailored to the significant qualities of the sites and the amount of data needed to answer the questions in the research design. It has nothing to do with the extent of disturbance. If the intent is to have specific measures for the amount of hand excavation, linked somehow to the amount of site disturbance, then that must be specified in the DEIR in some concrete way (either volume of excavation, or percentage of the site, or a ratio of the volume of site disturbance, or some other concrete measure) so the Tribe has an opportunity to review and comment. Such decisions cannot be deferred to some unspecified future time. **NCTC-19**

When data recovery is the only feasible mitigation, a data recovery plan "shall be prepared and adopted prior to any excavation being undertaken." There are specific requirements for data recovery plans. Even though the CEQA Guidelines allow for certain details of a mitigation measure to be specified project approval when it is impractical or infeasible to include those details during the project's environmental review, it seems perfectly feasible and practical to include the data recovery plan as an appendix to the DEIR in this case. Moreover, it will be impossible to gauge the adequacy of the measure, whether it is proportional to the impacts, and whether there are any residual impacts without knowing the details of the plan. **NCTC-20**

MM CR/mm-2.3 calls for a Cultural Resource Protection Plan which may or may not include some level of tribal and archaeological monitoring. The language is unclear. Given the nature of archaeological resources on the Nipomo Mesa there is a high likelihood that sites will be discovered during construction. For that reason, tribal and archaeological monitoring of <u>all ground disturbance</u> should be required as a specific mitigation measure, and not just in the vicinity of known sites. The DEIR should provide details regarding the extent of monitoring required, when it shall occur, by whom, and under what conditions; such details are all omitted. These critical details cannot be deferred to some later, unspecified time. Again, the Tribes and public then have no way of judging the adequacy of the monitoring effort to mitigate impacts. **NCTC-21**

Along these same lines, there is no explanation of just what should happen when previously unidentified sites are discovered, or when unanticipated artifacts and features are found in the known sites. Please include this information in the DEIR. Definition of these mitigation details cannot be deferred; they must be included as specific measures in the EIR. **NCTC-22**

Regarding CR Impacts 4 and 5, any impacts to human remains would be significant and cannot be mitigated to less than significant levels by simply following state and law and local policy, as proposed in CR Impact 4. Simply following the law is not mitigation. We can see where you want to go with this—yank out the bodies and move on—but that's not explicitly stated as a MM. The text (page 4.5-22) states "The NAHC would determine a Most Likely Descendant (MLD) to complete an inspection of the site within 48 hours of notification and recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials." Is removal and analysis the only option? How do you know that's what the MLD will recommend? Leaving our ancestors' remains in place is always the preferred option, and there are many ways to accomplish that, but it is not mentioned as an alternative. Moreover, the MM does not even mention reburial if the individuals are moved!! One could assume that's what the author thinks would happen, but where would that occur? Removing and reburying human remains does not mitigate impacts to less than significant levels. This would be a Class I (significant unmitigable) impact. What about leaving them in place? Redesign to avoid? Not even considered! This section is completely inadequate. **NCTC-23**

The Tribe considers the cumulative impacts of this Project to be substantial, and that the proposed MMs are not adequate to mitigate those impacts. We request that the County require a specific MM that more comprehensively considers the broader cultural geography of the Nipomo Mesa and surrounding area, specifically geared to the cumulative impacts on cultural values and regional research. **NCTC-24**

Regarding tribal consultation and tribal cultural resources (Section 4.18), NCTC maintains that AB52 consultation has not been completed. We have had ongoing discussions with the County and developers' representatives that have not been concluded and need to continue. **NCTC-25**

TCR/mm-1.1 calls for the construction of a repatriation vault within site DR-001. This mitigation will have a significant residual impact on the site which is not addressed. Section 4.5 calls for avoidance of the site, so these measures are inconsistent and conflicting. **NCTC-26**

TCR/mm-1.2 calls for the incorporation of tribal themes and placenames into the project design, but provides no performance standards and designates no party responsible for ensuring the measure is carried out. This must be remedied. **NCTC-27**

We reiterate our mission to protect the natural and cultural resources of the Project area and to utilize this site for the interpretative benefit of the public. We extend an invitation for further collaboration with the County and public agencies to assist the Project in the development of educational opportunities at the site.

Sincerely,

Violet Sage Walker,
Northern Chumash Tribal Council Chairwoman

5

9.3.13.1 Response to Letter from Northern Chumash Tribal Council

Comment No.	Response
NCTC-1	The comment states Section 4.5.1, *Existing Conditions*, does not demonstrate any understanding of the local history, prehistory, or archaeology and states that it also ignores the Chumash history of Nipomo and lacks any discussion of local sites of importance to which the resources in the project area may be related, including the most relevant Chumash place in the region, *Nipumu*, the Northern Chumash village for which the current town of Nipomo is named. The Existing Conditions section in Section 4.5, *Cultural Resources*, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. The omission of a reference to *Nipumu* has been revised in Section 4.5.1, *Existing Conditions*, in the Final EIR.
NCTC-2	The comment states that CA-SLO-809, the archaeological site associated with *Nipumu* is less than a mile away from the project and should have been mentioned as the most substantial and well-known site in the area even though it is beyond the search radius. The Existing Conditions section in Section 4.5, *Cultural Resources*, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. Section 4.5, *Cultural Resources*, has been revised to reference *Nipumu's* influence.
NCTC-3	The comment states Section 4.5.1, *Existing Conditions*, does not include information about the well-known discovery of a Clovis point in the hills surrounding the valley, substantiating the Late Paleoindian use of the area. The Existing Conditions section in Section 4.5, *Cultural Resources*, is commensurate with the types of resources identified in the project area. The confidential technical report prepared for the project contains an expanded discussion of the prehistory, history, and ethnography of the area. Section 4.5, *Cultural Resources*, has been revised to include additional information regarding Mills et al. 2005.
NCTC-4	The comment states Section 4.5.1, *Existing Conditions*, does not include an overview of the Euro-American history of Nipomo. The confidential technical report prepared for the project contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. No changes in the environmental document are necessary in response to this comment.
NCTC-5	The confidential technical report contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. No changes in the environmental document are necessary in response to this comment.
NCTC-6	The comment states Mission San Fernando Rey is not in the Chumash territory. The mention of Mission San Fernando Rey is not in reference to the Chumash, it is a reference to an example of a mission (like Santa Barbara) where small ranchos granted to neophytes of these missions. No changes in the environmental document are necessary in response to this comment.
NCTC-7	The comment states that Section 4.5.13 glosses over the history of the project area and writes off one site (P-040-002271) as insignificant because it is "undoubtedly historic" without providing evidence. There are no documented land uses for the subject parcel to suggest that site P-040-002271 ever played a distinctive role in the evolution of Rancho Nipomo. P-040-002271 was not relocated. Its original documentation notes all identified Pismo clam fragments were from "legal" sized specimens, which indicates the resource is historic and not the result of prehistoric (or later) Native American harvesting and processing. No changes in the environmental document are necessary in response to this comment.
NCTC-8	The comment states that since all of the sites seem to contain marine shells that can be dated using radiocarbon, it would have helped in evaluating the eligibility of the sites for the CRHR and assessing potential project impacts. No collection was conducted as part of the Extended Phase I excavations or the pedestrian survey. Resources were presumed to be significant and mitigation has been identified to minimize impacts accordingly. No changes in the environmental document are necessary in response to this comment.

Comment No.	Response
NCTC-9	The comment states it does not appear that there has been any study of the proposed offsite conservation area/mitigation lands. No actions, change in use, or improvements are proposed for the offsite mitigation area. No changes in the environmental document are necessary in response to this comment.
NCTC-10	The comment states that Section 4.5.1.3.2, *Native American Coordination*, refers to a response from the Native American Heritage Commission (NAHC) but did not identify the nature or location of sacred lands in the project area so they could be protected. The comment also states the Northern Chumash Tribal Council did not receive a response to their inquiries to the County about this matter and, therefore, does not consider consultation complete and states the County should require an ethnohistoric study to identify sacred sites so project impacts can be identified and mitigated. The NAHC does not provide information regarding "positive" findings of the Sacred Lands File search. Their search parameters are based on the larger region and are not limited to the immediate project area. The NAHC provides a list of tribal contacts that may have information regarding tribal resources. The County conducted consultation, as per its obligations under Assembly Bill 52 to identify any such resources present in the project area. No changes in the environmental document are necessary in response to this comment.
NCTC-11	The comment states that the DEIR does not explain what qualities archaeological sites SR-001, P-40-2131, and P-40-2273 have that would make them CRHR-eligible. As stated in Section 4.5, *Cultural Resources*: "Based on the results of the XPI, the County is assuming for the purposes of this project that DR-001, P-40-002132, and P-40-2273 are CRHR-eligible under Criterion D (*Has yielded, or may be likely to yield, information important in prehistory or history*)." The XPI identified artifacts and ecofacts in sufficient quantities and in undisturbed contexts to consider the resources to contain important information. No changes in the environmental document are necessary in response to this comment; however, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
NCTC-12	The comment states the Extended Phase I (XPI) investigation does not constitute a significant evaluation, which is necessary and suggests that the cultural resources in the project area were not evaluated for significance. For the purposes of the project, the County as the lead CEQA agency can make an assumption of eligibility and if the resources cannot be avoided then they will require mitigation to reduce the level of significance or the impact would be considered significant. No changes in the environmental document are necessary in response to this comment.
NCTC-13	The comment refers to a letter dated 12-13-21 from Cultural Resource Specialist Morgan Bird that refers to a subsequent comprehensive technical report. The comment requests that the subsequent technical report be provided to the Northern Chumash Tribal Council and that the comment period on the DEIR be extended for 30 days from receipt of the document to allow additional time for review and comment. The report was provided to tribes through ongoing tribal consultation and substantiated the information in the EIR. The EIR was circulated per the requirements of state law. No changes in the environmental document are necessary in response to this comment.
NCTC-14	The comment states that Mitigation Measures CR/mm-1.1 and -3.1 delay environmental review of off-site improvements and defer identification of impacts and mitigation measures to some future unspecified time. Offsite improvements were analyzed at a programmatic level and are located in predominantly heavily disturbed areas (roadways or roadside shoulders). Mitigation Measure CR/mm-3.1 requires review of all future off-site improvements by a qualified archaeologist; these reviews would be undertaken once off-site improvements are designed and the approximate location and area of disturbance is known. Mitigation criteria for avoiding and minimizing impacts to archaeological resources is well established and are detailed in CR/mm-3.1. Therefore, no changes in the environmental document are necessary in response to this comment.
NCTC-15	The comment asks whether the known archaeological sites will be avoided or not. The project has been designed to avoid one of two sites within the Specific Plan Area. Since future development within the Specific Plan Area has not been designed, it is uncertain whether portions of the other site can be avoided or to what degree. Therefore, Mitigation Measure CR/mm-2.2 has been included to require preparation of a Data Recovery Plan by a County-approved qualified archaeologist. The plan would require resource-specific data recover prior to initial site preparation and infrastructure establishment, as well as prior to all future phases of the project occurring within 50 feet of an Environmentally Sensitive Area. The Data Recovery Plan would be tailored to the level of physical disturbance at each resource (if any). As the full extent of proposed disturbance cannot be determined at this time, it is not practical to include the preparation of the Data Recovery Plan as part of this Environmental Impact Report. The Data Recovery Plan would be prepared in direct coordination with local tribal groups and submitted to the County of San Luis Obispo Planning and Building Department for review and approval. Additional specific performance standards and criteria of the Data Recovery Plan are detailed in Mitigation Measure CR/mm-2.2. No changes in the environmental document are necessary in response to this comment.

Comment No.	Response
NCTC-16	The comment states that since data recovery through excavation is not the only feasible mitigation for the impacts of this project, the EIR must explain why avoidance and preservation in place are not feasible or why other measures better mitigate the impacts. Please refer to response to comment NCTC-15.
NCTC-17	The comment requests detailed maps showing the locations of all proposed ESAs, and further requests that the comment period of the DEIR be extended for 30 days following receipt of those maps to allow sufficient time for review and comment. NCTC was provided this information during consultation. Please refer to response to comment NCTC-13.
NCTC-18	The comment states that the determination that surface deposits without identified subsurface components are not eligible for the CRHR is based on assumptions that are not specified in the DEIR. Of the approximately 180 shovel tests conducted in proximity of the resource to be potentially impacted, only small areas with subsurface components were identified in the project area and no diagnostic or datable materials were identified on the surface outside of the known site boundaries. These isolated materials have no information potential and are not datable. This clarification has been made to *Extended Phase I Results* under Section 4.5.1.3.4, *Extended Phase 1*.
NCTC-19	The comment asks for clarification regarding the sentence: "The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any)." Data recovery will only occur in eligible resource areas that will be disturbed by the project so as not to unnecessarily disturb site areas that would otherwise be protected/undisturbed by project activities. No changes in the environmental document are necessary in response to this comment.
NCTC-20	The comment states that it would be feasible and practical to include the data recovery plan as an appendix to the DEIR at this time. Please refer to response to comment NCTC-15.
NCTC-21	The comment requests tribal and archaeological monitoring of all ground disturbance be required, not just in the vicinity of known sites. Mitigation Measure CR/mm-2.3 allows the County, in coordination with the tribe(s), and the archaeological consultant(s) to tailor the monitoring effort to the project, as those parties feel is appropriate given, for example, the nature/depth/location of construction activities, the level of sensitivity of a particular area or proximity to known resources, and the stage of construction activities (for example, monitoring during surficial contouring of an area that had already been mass graded to a maximum depth of disturbance would not be necessary). Mitigation Measure CR/mm-2.3 has been revised to include a requirement for tribal monitoring.
NCTC-22	The comment states there is no explanation of what should happen when previously unidentified sites are discovered, or when unanticipated artifacts and features are found in the known sites. As discussed in Section 4.5, *Cultural Resources*, based on the extent of future buildout and associated ground-disturbing activities, there is potential for inadvertent discovery of unknown cultural resource sites if present within the Specific Plan Area. Mitigation Measure CR/mm-2.3 has been identified to ensure protection of unknown cultural resources through implementation of avoidance and minimization measures in the event of inadvertent discovery. Further, Mitigation Measure CR/mm-2.4 has been identified to require worker awareness training to ensure construction workers and other project personnel are made aware of known cultural resources, the potential for inadvertent discovery of unknown cultural resources, and the proper protocol to be implemented if cultural resources are encountered during construction activities. Implementation of the identified mitigation measures would ensure avoidance and minimization of impacts to known and unknown cultural resource sites. No changes in the environmental document are necessary in response to this comment.
NCTC-23	The comment states that any impacts to human remains would be significant and cannot be mitigated to less-than-significant levels by simply following state and law and local policy as proposed in CR Impact 4. The language "…and recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials" has been removed from the section. Inadvertent discovery, including human remains will be subject to local and state law. California Health and Safety Code Section 7050.5 requires that in the event of an inadvertent discovery of human remains, work shall cease within the vicinity of the discovery, a qualified coroner shall identify human remains, and if the remains are identified to be of Native American descent, the NAHC shall be contacted. The NAHC will determine a Most Likely Descendant (MLD) to complete an inspection of the site within 48 hours of notification. Under this State law, the MLD will provide input on appropriate procedures for addressing human resources if encountered during project activities. Mitigation Measure CR/mm-2.3 includes the development of a project-specific protocol for inadvertent discovery and halt work scenarios and includes requirements for tribal coordination. Further, Mitigation Measure CR/mm-2.3 has been revised to outline requirements for tribal monitoring.

Comment No.	Response
NCTC-24	The comment states that the Tribe considers the cumulative impacts of the project to be substantial and that the proposed mitigation measures are not adequate to mitigate those impacts. The commenter requests that the County require specific mitigation measures that more comprehensively considers the broader cultural geography of the Nipomo Mesa and surrounding area, specifically geared to the cumulative impacts on cultural values and regional research. While there is a cumulative loss of archaeological resources occurring across the Nipomo Mesa and the County more broadly due to all current, past, and reasonably foreseeable projects that may impact cultural resources, the project's contribution to that loss is not cumulatively considerable. The project has been designed to avoid and protect as open space the most intact known resource. Impacts to the resource which cannot be avoided would be mitigated as described in responses to comments NCTC-1 through NCTC-23, above. With mitigation, impacts to known resources within the Dana Reserve Specific Plan Area would be reduced to less than significant and would not be cumulatively considerable. Therefore, no changes in the environmental document are necessary in response to this comment.
NCTC-25	The comment maintains that AB 52 consultation has not been completed. The County continued tribal consultation with NCTC throughout the EIR process, including meetings into the Spring of 2023. Per Public Resources Code Sections 21082.3 and 21080.3, tribal consultation ends when either (i) both parties agree to measures to avoid or mitigate a significant effect on a tribal cultural resource, or (ii) when a party, acting, in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. The County met with NCTC on May 16, 2023 to further discuss the tribe's primary concerns: (1) protection of cultural resources to be impacts; (2) tribal housing; (3) concerns about tribal monitors; and (4) the need to incorporate additional detail into mitigation measures. The County explained its position on each of these issues to NCTC at this meeting; resolution of those issues is partially discussed in responses above. No changes to the EIR are required in response to this comment.
NCTC-26	The comment states that TCR/mm-1.1 will have a significant residual impact on the site which is not addressed. Mitigation Measure TCR/mm-1.1 has been revised to include information that specifies the vault will be placed in the site boundary but outside of areas known to contain subsurface deposits.
NCTC-27	The comment states that TCR/mm-1.2 calls for the incorporation of tribal themes and placenames into the project design, but provides no performance standards and designates no party responsible for ensuring the measure is carried out. Mitigation Measure TCR/mm-1.2 lists the design considerations that would be required and the MMRP (Chapter 7 of the EIR) identifies the County Planning and Building Department as the party responsible for verifying compliance with this measure. Therefore, no changes in the environmental document are necessary in response to this comment.

9.4 APPLICANT COMMENT LETTER AND RESPONSES

The applicant has submitted comments on the Draft EIR.

Table 9.4-1. Applicant Comments

Respondent	Code	Contact Information	Page
Dana Reserve LLC (via RRM Design Group) Letter dated: 08/01/2022	DRL	3765 South Higuera Street, Suite 102 San Luis Obispo, CA 93401 *Contact: Nick Tompkins, Dana Reserve LLC* *Matt Ottoson, Senior Planner, RRM Design Group*	9.4-3

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9.4.1 Dana Reserve LLC (via RRM Design Group)

August 1, 2022

Transmitted via email: jguetschow@co.slo.ca.us

Jennifer Guetschow
County of San Luis Obispo
Department of Planning and Building
976 Osos St, Ste 200
San Luis Obispo, CA 93401

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Jennifer,

Thank you for the opportunity to provide comments on the Dana Reserve Specific Plan Draft Environmental Impact Report, SCH No. 202160558, SWCA Project Number 64873, dated June 2022.

Attached you will find the applicants comments on pages 1-24. We have attached the applicant's comments arranged in tabular format referencing the DEIR Chapter Number, Chapter Title, section number, page, or paragraph for each comment. Our comments are purposely brief to focus on specific facts, errors, inconsistencies, or issues we identified. We are available to explain each of the comments that are not self-explanatory. We are available to further review and clarify with you (and/or SWCA) any comment or issue we have identified.

Please don't hesitate to contact us with any questions you or SWCA may have about our comments.

Sincerely,

Matt Ottoson, Senior Planner
RRM Design Group

Nick Tompkins
Dana Reserve LLC

cc: Victor Montgomery, RRM Design Group
Laurie Tamura, Urban Planning Consultants
Matt Ottoson, RRM Design Group
Robert Camacho, RRM Design group

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DANA RESERVE
DRAFT EIR

Comment Letter
August 1, 2022

General Comments
There are a number of instances in which the author of the EIR concludes that there is a potential inconsistency between the proposed project and various policies contained in the County's General Plan; however, the analysis that the EIR author has employed is inconsistent with how such a policy consistency analysis should be undertaken. While Applicant provides specific comments to these points below, Applicant provides these general comments on this issue to avoid excessive duplication given the overlapping issues that apply throughout the EIR. As a legal matter, General Plan policies are not to be considered in isolation but rather must be understood in the context of the General Plan as a whole. As the courts have explained, General Plan policies seemingly in tension with one another (e.g., pro-development and anti-development policies) should be reconciled and harmonized to the extent reasonably possible (*No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal.App.3d 223, 244.) The EIR author does not appear to apply this principle, but rather frequently interprets specific General Plan policies in complete isolation from other relevant policies. The author of the EIR also fails to account for the principle that a proposed project is only inconsistent with the governing general plan if the project "conflicts with a general plan policy that is fundamental, *mandatory*, and clear." (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Supervisors* (1998) 62 Cal.App.4th 1332, 1341-1342, italics added; see also *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 782 ["[a] project is inconsistent if it conflicts with a general plan policy that is fundamental, mandatory, and clear"].) Perfect conformity with every general plan policy is neither achievable nor required. (*Ibid*.)

DRL-1

Executive Summary		
ES-1	Para 3	Please add to the description Dana Ridge is 388 acres.
Impact Table		Throughout this letter the Applicant has provided comments on MM's and other items that will require corresponding changes in this table as they are updated. Applicant has not restated those comments here so as to reduce potential redundancies in this letter. There are several instances in the EIR where the impact identified in the heading does not match associated Table. For example, Hydrology/Water Quality-page 4.10-29-HYD impact 6 Table note noted as Class II but Class III in rest of table. Please verify that everything is consistent and update as necessary.

DRL-2

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Chapter 2: Project Description			
2-3	Para 2	To the south is residential-suburban but also commercial uses along the Frontage Road.	DRL-3
2-8	Item 7 Figure 2-5	Item 7 improvement is not shown on Figure 2-5; it should be.	DRL-4
2-18	Para 4	Along Collector A will also "provide access and infrastructure connections as well as public facilities such as a park and ride and a potential fire stations, as described below". Please add this information to this paragraph.	DRL-5
2-20 2-22 2-23	Table 2-2 Sec. 2.5.3.11 Table 2-5	Density was revised for DR-SF2 to 11-13 du/ac (correspondence to County on 01/14/22). Revise Table DR-SF2 Allowable Density to 11-13 du/ac	DRL-6
2-22	Table 2.4	Add footnote 4 stating that there will be a transit center, park and ride, and fire station in the RR parcel for Collector A.	DRL-7
2-26	Para 2	Provide updated information from the 2020 census.	DRL-8
2-29	Table 2.9	To make sure that alternative fuel stations, such as hydrogen and EV charging are allowed, please add "Alternative Fueling Installations" as permitted use in the Commercial Zones. Alternative fuels will be important for TDM and GHG reduction Mitigation Measure.	DRL-9
2-30	Sec 2.5.3.1.3	Missing Table 2-10 Rec and OS Development Standards from Specific Plan. Should insert in this section.	DRL-10
2-40	Cherokee Place	Please find attached an exhibit that illustrate the Cherokee Road improvements at the Collector A and B intersections.	DRL-11

Chapter 3: Environmental Setting			
3-1	Para 4	There is no reference to the US Census 2020. The population of Nipomo should be added in this section.	DRL-12
3-2	Para 1	This property has had documented use primarily for cattle grazing as well as periodic, seasonal dry farming for feed. Every section that refers to the agricultural use of this property should note this historic use of the property.	DRL-13
3-2	Para 3	Please add the Dana Ridge acreage: 388 acres	DRL-14
3-7	Para 1	The cumulative lists need a total for the build out. 300-unit housing units and ADUs and commercial sq. ft. The total build out should be at the end of the list.	DRL-15

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4.1: Aesthetics			
4.1-5	Para 1	Please add grazing and cultivation dry farming for feed as noted above.	DRL-16
4.1-13-18	Goal 2 Policy VR 2.1 Policy VR 2.2	See General Comment above. The policies that refer to the rural character of the site should note that the DRSP is immediately adjacent and surrounded by development and was planned growth in the SCAP and in the Sphere of Influence for NCSD. This is not rural property and these findings of inconsistency need to be amended.	DRL-17
4.1-26	AES/mm 3-1	The existing So Cal Gas easement is 20 feet wide. Applicant agrees to an additional 30 feet for planting trees for a total of 50 feet for a landscaping buffer. Revise this Mitigation Measure and correct throughout the document and EIR.	DRL-18
4.1-27	AES/mm 3.2	This MM only adds up to 50% of the trees in various sizes we suggest that the MM be revised. "Any replacement trees planted within the 'on-site' property boundary along US Highway 101 shall be of varying sizes. Such replacement trees shall include the following container sizes - 45% in 15-gallon, 45% in 24-inch box, and 10% in 48-inch box trees. These trees are part of the Applicant proposed 1,500 oak trees to be planted in the DRSP. These trees will be monitored for seven years for maintenance and any trees that do not survive will be replaced.	DRL-19
4.1-29	AES/mm 7.1	This EIR has already done the visual assessment for this project. The only areas of visual impact are those buildings along US Highway 101 and they have already been analyzed in this EIR. This is a redundant MM and should be deleted.	DRL-20

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4.3: Air Quality			
4.3-15	Policy AQ-1.2	See General Comment above. Policy AQ-1.2 does not, as the EIR author seems to assume, dictate the conclusion that any significant VMT impact under CEQA necessarily translates into a policy violation. Rather, the policy itself only states broadly that the County should "[r]equire projects subject to discretionary review to minimize additional vehicle travel." With mitigation, the project satisfies this very general obligation. In addition, as noted in other sections, the VMT is only 5% over the threshold, and GHG emissions and air pollutants associated with VMT will reduce over time as more electric vehicles are purchased.	**DRL-21**
4.3.20	Infill 8	See General Comment above. The project should be considered consistent with this policy (Infill 8). Although the policy states that the County should support mixed use and infill development, the policy does *not* provide that development that cannot be characterized as infill development is *dis*allowed. The proposed project is with the SCAP and Nipomo SOI, and thus is clearly contemplated for development by the SLO County General Plan. Please revise this discussion as the Nipomo URL will be expanded when this project is approved and then will be considered infill.	**DRL-22**
4.3-20-23	Policy 11-24	See General Comment above. Please add in each of these discussions that this property is planned for development in the SCAP and is in the Nipomo SOI and adjacent to the current service line.	**DRL-23**

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4.3: Air Quality		
4.3-25	L-3	See General Comment above. Land Use Planning Strategy L-3 does not use mandatory language. Rather it states that "[w]ithin cities and unincorporated communities, the gap between the availability of jobs and housing *should* be narrowed and *should* not be allowed to expand." "Should" is not the same as "shall." In general, a proposed project is only inconsistent with the governing general plan if the project "conflicts with a general plan policy that is fundamental, *mandatory*, and clear" (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Supervisors* (1998) 62 Cal.App.4th 1332, 1341-1342, italics added; see also *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 782 ["[a] project is inconsistent if it conflicts with a general plan policy that is fundamental, mandatory, and clear"].) Perfect conformity with every general plan policy is neither achievable nor required. (*Ibid.*) Here, moreover, Land Use Planning Strategy L-3 should be construed in a *regional* context and in light of recent state legislation declaring a statewide housing crisis. (See, e.g., Gov. Code, § 65589.5, subd. (a).) The current finding of potential inconsistency does not address the *regional* need for housing in the existing employment centers in the City of SLO. This project will provide a variety of housing for these existing employees that are needed now. Please add this regional perspective in this section.
4.3-34-35	AQ/mm-3.3	7. Remove this MM – the transit center and park and ride has been designed to meet relevant standards for the DRSP. 19. Delete "valet" bike parking as the project does not have any entertainment venues.

DRL-24

DRL-25

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4.4: Biological Resources		
4.4-9	Para 2	This paragraph states that there are 18 plants potentially on this site but table 4.4-3 only lists 17 plants. Add *Dienandra paniculata* that was not detected onsite. Please correct.
4.4-40 - 4.4-48	Table 4.4-6 (Preliminary Policy Consistency Evaluation)	See General Comment above. The table finds the proposed project to be "potentially inconsistent" with a number of goals and policies from the General Plan (For example Goal BR-1, Policies BR-1.2, 1.4, 1.9, and 2.6, Goal BR-3 and Policies BR-3.1, BR-3.2, and BR-3.30). The interpretations here are inflexible and would appear to make any kind of development very difficult. The General Plan, through the South County Area Plan for example, treats the project area as one in which development is appropriate. Yet various policies are interpreted in this table in a way that would negate this prior County policy determination. The policies addressed in the table must be interpreted in light of the fact that the Board of Supervisors has already determined that relatively dense development of the site is appropriate. Policies that include vague or flexible language (e.g., "minimize" impacts) should not be interpreted as though they set stringent quantitative standards that absolutely must be satisfied. Nor should compensatory mitigation be precluded as a method of achieving consistency. In some instances, the analysis suggests that the reliance on conservation required under CEQA (Pub. Resources Code, § 21083.4, subd. (b)(2)) conflicts with more protective General Plan policies and yet the General Plan specifically incorporates the CEQA approach (see Implementation Strategy BR 3.3.1). Many of the "potentially inconsistent" conclusions appear to be based on impacts to species that are not formally listed under the California Endangered Species Act (CESA) or the Endangered Species Act (ESA) but rather are only "listed" by the California Native Plant Society (CNPS), a nongovernmental organization (the only listed species of concern is the Pismo Clarkia). Thus, impacts on CNPS-listed species are being invoked in order

DRL-26

DRL-27

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4.4: Biological Resources		
4.4-40 - 4.4-48 - (continued from previous page)	Table 4.4-6 (Preliminary Policy Consistency Evaluation) - (continued from previous page)	to render development difficult or impossible based on a very stringent reading of the goals and policies at issue. The "no net loss" requirement in Policy BR-1.4 is applied to oak woodlands even though there is a separate policy – BR-3.3 – that applies specifically to oak woodlands. Associated with the latter policy is an implementation measure that specifically incorporates the CEQA approach, which allows for preservation as mitigation. Importantly, nothing in the law requires the County to give so much weight to potential impacts on species "listed" by the CNPS (see *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 44-48 [CEQA Guidelines section 15380 did not require the respondent lead agency to make a "specific finding or determination as to whether" a particular species "was 'rare' or 'endangered'"]; see also *id*. at pp. 41-42 [CEQA does not "requir[e] public agencies to deny approval of any project where the perpetuation of rare or endangered species on the site cannot be guaranteed"]). The project Applicant does not believe that, in adopting the various policies addressed in Table 4.4-6, the Board of Supervisors intended to greatly ratchet back the development potential of sites such as the project site due to impacts on species that do not rise to the level of being formally listed as endangered or threatened under either CESA or ESA. Rather, the author of the table seems to be subjectively giving undue weight to impacts to CNPS-listed species – so much weight as to make any substantial development on the project site seemingly problematic.
4.4-40 4.4-42 4.4-45	Goal BR-1 Policy BR-1.4 Goal BR-3 Policy BR-3.1 Policy BR-3.2	The second paragraph in the discussion makes no mention of the project description that includes ~1,500 oak trees that will be retained on the project site ~1,500 oak trees that will be planted throughout the site ~10,000 to 14,000 oaks trees at the Dana Ridge site And the Applicant proposed native garden onsite. Please revise these discussions and add this information.

DRL-27 (cont'd)

DRL-28

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4.4: Biological Resources			
4.4-41	Policy BR 1.2	This policy should be deleted as it does not apply to this project. The biological report did not describe the DRSP habitats as "essential" as this term applies to linkages between blocks of intact habitat, "particularly as corridors for wildlife" (CDFW 2022). The Cal. Essential Habitat Connectivity Project does not identify Dana Reserve.	DRL-29
4.4-42 4.4-46 4.4-47	Policy BR 1.4 Policy BR 1.9 Policy BR 2.6 Policy BR 3.3 Policy OS 1.1 Policy OS 2.1 Policy Obj. 6.4	Please revise all these discussions: "The Applicant proposes a 4.27-acre native garden to be planted on site to restore the Burton Mesa Chaparral and other plants with scattered oak trees. The Applicant will preserve this open space for these plants." Since these plants are already on this site it only makes sense for the County to encourage and support a restoration project on this site for the benefit of the plants and the community like the Nipomo Native Gardens. See attached memo and plans previously submitted to the County, which are incorporated by reference.	DRL-30
4.4-43	Goal BR 2	Please revise this discussion as follows: "Populations of Pismo Clarkia, a state-listed rare plant, will be protected on site through a conservation easement. An approved Incidental Take Permit from the CDFW will include mitigation measures to replace a small patch of plants removed for construction of Collector B. Other mapped patches and adjacent suitable habitat will be conserved on site to allow for expansion of the plant population as part of the incidental take permit process."	DRL-31
4.4-43	Policy BR 2.1 Policy BR 2.2	Please revise this discussion as follows: Mitigation Measures require the project Applicant and/or NCSD to obtain all necessary wetland/waterway permit approvals from USACOE, CDFW, RWQCB prior to issuance of grading permits for off-site infrastructure improvements. Grading in the area where the Pismo Clarkia is located will require an ITP permit under Fish and Game Code 2081(b) from CDFW before starting.	DRL-32

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4.4: Biological Resources			
4.4-46 4.4-47	Policy BR 3.5 Policy BR 4.1 Policy BR 4.2 Policy BR 4.7 Policy BR 5.1 Policy BR 5.2 Policy 3	Please revise to state "Applicant **and/or NCSD"** will conduct a wetland delineation ….	**DRL-33**
4.4-63	BIO/mm-5.1	The first sentence in this MM needs to be deleted. The discussion above states that these off-site eucalypti are marginal for aggregating monarch butterflies. We suggest the MM be rewritten as follows: "Monarch Butterfly Preconstruction Survey. Preconstruction surveys of potential monarch butterfly overwintering habitat on site or adjacent to the site shall be conducted by a qualified monarch butterfly biologist beginning October 1st and continue through February. If site disturbance is proposed within 200 feet of potential monarch butterfly overwintering locations during the aggregation season (October 1 through February) surveys shall be conducted from the Dana Reserve and/or public roads for three mornings at least one week before planned disturbance. If clustering monarch butterflies are observed, site disturbance and construction activity within 200 feet of monarch butterfly overwintering habitat shall be prohibited while monarch butterflies are in an overwintering aggregation. A 200-ft buffer shall be installed with T-posts and rope, labeled as Environmentally Sensitive Habitat every 75 to 100 feet. If monarch butterflies are observed in overwintering aggregation, monitoring shall be conducted during daily active construction visits to document numbers and assure that no disturbance of the aggregation is caused by construction."	**DRL-34**
4.4-64, -65	BIO/mm-6.1	Bullet 4 is not necessary. Bullet 7 should be explicit that a qualified biologist must hold a Scientific Collecting Permit per Title 14 California Code of Regulations § 650 to handle Species of Special Concern (SSC). Residual Impacts: Remove reference to BIO/mm-14.1, BIO/mm-15.1, and BIO/mm18.2 as they do not apply to this impact.	**DRL-35**

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4.4: Biological Resources			
4.4-66,-67	BIO/mm-8.1	In both Implement MM and Residual Impacts: Remove reference to BIO/mm-14.1, BIO/mm-15.1, and BIO/mm18.2 as they do not apply to this impact.	DRL-36
4.4-67,-68	BIO/mm-9.1	In both Implement MM and Residual Impacts: Remove reference to BIO/mm-14.1, BIO/mm-15.1, and BIO/mm18.2 as they do not apply to this impact. In the second paragraph of this mitigation measure delete ~~"and avoidance is not feasible ".~~ Avoidance is not possible within the DRSP property, and it is safer for the badger and workers to have the badger relocated.	DRL-37
4.4-69	BIO/mm-10	The improvements for the Frontage Road extension will not impact any identified species so delete refence to BIO /mm2.1 through BIO/mm-2.3, BIO/mm3.1. BIO/mm-4.1 and 4.2 in both the first section and Residual Section.	DRL-38
4.4-70	BIO/mm-11	This MM only applies to animals, not plants, so delete refence to BIO /mm2.1 through BIO/mm-2.3, BIO/mm3.1. BIO/mm-4.1 and 4.2 in both the first section and Residual Section.	DRL-39
4.4-71	BIO/mm-12.1 Line 6	Since this mitigation measure is focused on a section of water pipeline installation near Nipomo Creek, we suggest that this mitigation measure clearly state that the "**suitable habitat located up stream in Nipomo Creek outside of the construction Zone(s). "**	DRL-40
4.4-93	BIO/mm-19.1	Recommend changing the third line to say "**certified arborist" instead of qualified arborist**. To be consistent with other mitigation measures in this EIR, the following should be added to this mitigation measure. **"Impacted oak trees shall be monitored for 5 years and if found to be in declined, shall be replaced at a 4 to 1 ratio. A draft replacement plan with specific receiver site such as parks in the Nipomo area shall be approved by the County of San Luis Obispo prior to threatening within the CRZ of any oak tree."**	DRL-41

4.5: Cultural Resources			
4.5-21	CLRmm-3.1	Please add the following text to this MM: "…retained by the Applicant <u>or utility district/company</u>"	DRL-42

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4.6: Energy			
4.6-10	Princ. 1, Policy 5	3CE - might not be an option in the future? But it should be noted that PG&E also needs to have a green portfolio for electricity generation and can serve this project as well as 3CE.	DRL-43
4.6-12		Not 11-acre public park, reword to 10-acre park and 1-acre equestrian staging area. This edit should be done through the document.	DRL-44

4.7: Geology and Soils			
4.7.31-32	GEO/mm 8.1 GEO/mm 8.2 GEO/mm 8.3	The discussion in this impact section states that there is low paleontological potential for this site. It is excessive to have to hire a paleontologist to write monitoring and mitigation plans, WEAP's, and handling plans when the EIR states that there is low potential of any finds. Observing grading and construction adds additional unnecessary costs. These MMs should be deleted or be revised to state "if discovery during grading is found…" If the staff believes that they need something for this low impact, we will agree that the WEAP could be prepared for the construction phase of this project.	DRL-45

4.8: Greenhouse Gas Emissions			
4.8-3 4.6-6 4.8-7 4.8-8 4.8-12	Para 2 Para 4 Para 5 Para 5 Para 1	Each of these sections should state that the 1990 level of GHG was 530 MM tons. California has successfully reduced GHG levels to 419 MM tons in 2020 level. This is over a 20% reduction since 1990 levels. These GHG levels will continue to fall as the state reduces reliance on fossil fuel for electricity and transportation (see page 4.8-25 last sentence).	DRL-46
4.8-12	Para 2	The Dana Reserve incorporates all the RTP/SCS standards into this project. This should be noted in this paragraph.	DRL-47
4.8-13	Policy AQ 1.2	This statement should clearly state that the VMT only exceed the threshold by 4.8% and 9%. These are minor exceedances.	DRL-48

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4.8: Greenhouse Gas Emissions			
4.8-14 4.8-15 4.8-15 4.8-15 4.8-15	Policy E 1.1 Policy E 3.1 Policy E 3.2 Policy E 4.1 Policy E 4.4 Policy E 5.4	Please note that the nonresidential uses are still planned to be served by natural gas. There will be a natural gas service line installed along Collector A. This natural gas will serve the commercial and school buildings which only cover 17% of the overall project site.	DRL-49
4.8.-19 4.8-20 4.8-21	Infill 8 Infill 11 Infill 12 Livable 12 Livable 13 Livable 14 Livable 15 Trans 18 Trans 19 VMT 20-24	See General Comment above. As noted earlier, the project should be considered consistent with Policy Infill 8, which, though supporting mixed use and infill development, does *not* disallow development that cannot be characterized as infill. This project is consistent with the SCAP and the NCSD SOI is an identified area for infill development. When the Nipomo URL **and the NCSD annexation** is expanded to include this property then it will be considered infill. Revise this statement here and note in these other sections of the EIR.	DRL-50
4.8-27	GHG/mm-1.1	#8. High reflective roofing material should only be installed on flat roofs as these reflective roofs could cause significant aesthetic impacts if required in residential areas with houses with sloped roofs or along US highway 101. Please revise this MM. Add measures to reduce GHG: #10 All residential structures will include PV, consistent with state requirements. #11 EV stations will be provided in the multifamily units, commercial, school and hotel, consistent with state requirements.	DRL-51

4.10: Hydrology and Water Quality			
4.10-1	Para1 Opening sentence	Eliminate the word “adverse”.	DRL-52
4.10-1	Para 3 Line 6	Revise to note that the other northern parcel, which is APN 091-301-030 for point of reference, has existing agricultural structures and unpaved ranch roads.	DRL-53
4.10-5	Para 2 Line 4	“Municipal mix” is also referred to as “blended “ water.	DRL-54

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4.10: Hydrology and Water Quality			
4.10-15	Policy WR 1.9	Eliminate the words "service area". It should just state annex to NCSD. This should be changed throughout the EIR.	DRL-55
4.10-25	Groundwater recharge	Add the following in a new paragraph, "The project will be entirely served by NCSD water. Effluent generated within this project will be transported to the NCSD's Southland Wastewater Treatment facility, treated, and made available for recharge to the groundwater of the management area, thereby increasing return flows of water available for recharge. Up to 50% of the water used in this project can return to the groundwater basin."	DRL-56

4.11: Land Use and Planning			
4.11.7	Para 4	The Dana Reserve Specific plan has incorporated all these features and is consistent with the RTP/SCS.	DRL-57
4.11.8	Policy AQ 1.1	See earlier comment regarding General Plan policies. This project is consistent with this policy. Please correct the other discussions in the rest of the EIR related to this policy.	DRL-58
4.11.22	Infill 8	See earlier Comment regarding General Plan policies. For reasons discussed earlier, this project is consistent with this policy. Please correct the other discussions in the rest of the EIR related to this policy.	DRL-59
4.11-36	LUP Impact 3 (Class 1)	This site is vacant. There is no job/housing balance "within the project area". This should not be a Class I impact.	DRL-60
4.11-31 4.11-38	Goals Policies	See earlier Comment regarding General Plan policies. This section restates Goals, Policies, and Objectives that were deemed to be Potential Inconsistent throughout this EIR. Any policy discussions that are updated elsewhere pursuant to specific comments need to be update here as well.	DRL-61
4.11-40	Para 5 Line 4	Delete reference to maintenance of the bus stop on North Thompson Avenue. There is no nexus for this requirement for a regional off-site improvement. Delete this elsewhere in the EIR.	DRL-62

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4.11: Land Use and Planning			
4.11.41	Para 2 Table	Please correct the first sentence and the rest of the paragraph and the table as the request for this project is to adjust the Nipomo URL and Annexation to the Nipomo NCSD. This project cannot be approved without these adjustments. The project will be consistent with the SCS and other policies for infill once these boundaries are adjusted. Please make this correction throughout the EIR.	**DRL-63**

4.13: Noise			
4.13-18	Para 4	We request that in this paragraph you state that the site design of this project places all the commercial buildings along the freeway and these buildings will serve as sound buffers for the neighborhoods 1, 2, and 3. It should be noted that the Applicant Preferred Alternative moves Neighbor 10 (PSHH PARCEL) out of **these noise contours so is an environmentally superior alternative addressing noise impacts as well as a superior environmental justice alternative.**	**DRL-64**
4.13-19	N/mm-1.2	1. Noise studies for neighborhoods 1, 2, and 3. This MM should clearly state that the commercial buildings should serve as an adequate buffer for these neighborhoods.	**DRL-65**
4.13-19	N/mm-1.2	2. Noise studies are not required if the listed equipment is installed on the east side (facing 101) of the proposed buildings. Please add this statement to this MM.	**DRL-66**

4.14: Population and Housing			
4.14-1 4.14	Para 4	Correct "decrease" should be "increase". Throughout this section and the rest of the EIR please resolve the discrepancy between 272 and 273 new jobs. The whole document should state 273 new jobs.	**DRL-67**
4.14-15	Para 2&3	Please explain in this section that the Growth Management Ordinance will not apply to the DRSP. It is a stand-alone planning document.	**DRL-68**
4.14-6	Para 3	Change reference to Table 4.14-12 to Table 4.14-13 in this paragraph.	**DRL-69**

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4.14: Population and Housing			
4.14-18	Princ. 2, policy 2	See earlier discussion regarding General Plan policies. This determination needs to be rewritten to state. **Potentially Consistent:** Upon the approval of the adjustment of the Nipomo URL and the annexation to the NCSD, the DRSP with residential and commercial uses will be consistent with this policy.	DRL-70
4.14-25	Para 1	This paragraph is not consistent with the population numbers in the Recreation section, Table 14.15-9 states that the 2030 population will be 24,326. Correct this paragraph.	DRL-71
4.14-26	Para 2	The DRSP is in response to the South County Area plan, which required a Specific Plan for the Canada Ranch. The housing needs in the County are severe and this project addresses the range of needed housing in this area.	DRL-72
4.14-28	Para 1	This paragraph should also address the need to plan for the RHNA housing numbers that are assigned to the County every 8 years. This site was designated for development and housing as the Canada planning area in the South County Area Plan. This is not unplanned growth and should not be a class I impact.	DRL-73

4.15 Public Services			
4.15-7	Para 4	This section of the document should rely on the final 2020 Census numbers.	DRL-74
4.15-12 4.15-14 4.15-15	Policy 2.2 Public Facilities #1 Public Facilities #2,3	See earlier discussion regarding General Plan policies. All these policies state that funding has not been secured for long-term maintenance of the neighborhood park. Before this project is approved by the Board of Supervisors, this funding source will need to be resolved. All the policies statements need to be changed to state that that **"upon approval of the DRSP with future funding sources for this park this project is consistent with these policies".**	DRL-75
4.15-14	Princ. 1, Policy 2 Strategy 4	This determination needs to be rewritten in that no development will be approved or built unless this project is within the Nipomo URL and annexed to the NCSD service area. **With this annexation action the project will be consistent with this policy and strategy.**	DRL-76

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4.15 Public Services			
4.15-17	Para 4 Line 4	This statement needs to be revised. The capital plan for the fire service includes the property at Black Lake for a future station, but it is not in the best location for service this section of Nipomo. CalFire has requested that a fire station be located on this site and funds to be allocated to this new station.	DRL-77
4.15-18	PS/mm-1	This mitigation measure is only for the dedication of the improved land for the fire station. Also, this project will pay it developer fees. The construction of the building and the future operation will be the responsibility of the County.	DRL-78
4.15-19	Figure Table	This section should include the concept figure of the fire station location for reference to all these mitigation measures. See attached site plan.	DRL-79
4.15-21 4.15-26	Table 4.15-5 Table 4.15-9	This table is not consistent with Table 4.15-9. Population projections in 2030 for Nipomo in this table is 19,812 but in Table 4.15-9 the 2018 population is 29,040 and then in 2030 it is 24,326. Both tables need to be corrected.	DRL-80
4.15-27 4.15-31	Para 1 Line 16 Para 2 Line 13	Correct this sentence in both sections. Quimby Fees are capital funds for land purchase for new park land. These funds cannot be used for long-term maintenance of the public park.	DRL-81

4.16 Recreation			
4.16-9 4.16-10 4.16-15 4.16-16 4.16-16 4.16-17	Policy 2.2-7 Objective B Policy 6.4 Policy 6.9 Policy 6.10 So. Co. Inland Plan	See earlier discussion regarding General Plan policies. All these policies state that funding has not been secured for long-term maintenance of the neighborhood park. Before this project is approved by the Board of Supervisors, this funding source will need to be resolved. All the policies statements need to be changed to state that **"upon approval of the DRSP future funding sources for the park this project is consistent with these policies".**	DRL-82
4.16-14	Policy 4.2	Policy 4.2 does not apply to project – remove.	DRL-83

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4.17 Transportation			
4.17-1	Para 3, line 10	…provided in the "tis" TIS. Make correction.	DRL-84
4.17-2	Figure 4.17-1	Camino Caballo is not shown on the 4.17-1 map. Should also include Hetrick Ave all the way to Pomeroy and Cory Way (emergency access).	DRL-85
4.17-3	Para 4 Para 5	Cherokee Place - public right-of-way comprised of (2) 25-foot-wide centered along the northern property line of the DRSP. Currently there is a 20-foot wide dirt road existing in the northern 25-foot section on the adjacent properties. Hetrick Avenue right-of-way does go all the way to Pomeroy so need to correct the last sentence in this description. Should include Cory Way for emergency and trail access.	DRL-86
4.17-9		These should be another bullet stating that the fee update included improvements to Hetrick Avenue. However, these improvements will not be needed now that Collector B will be installed through the Dana Reserve project. The AB 1600 developer fees for Hetrick should be credited to Collector B.	DRL-87
4.17-10	Policy AQ 1.2	This finding should state that: **"Buildout of the DRSP would result in an increase of residential VMT (4.8% over the VMT threshold) and employee VMT (9.5% over the VMT threshold) even with implementation of Mitigation Measure TR/mm-3.1".** TR/mm 2 should be corrected to TR/mm-3.1	DRL-88
4.17-11	Policy 7	TR/mm- 2 should be TR/mm-3.1	DRL-89
4.17-12	Policy 9	"….include fair-sharing contribution for needed transportation improvements" – This phrase should be deleted as this project is providing two transit centers with dedicated land and infrastructure or at least state so in this finding.	DRL-90
4.17-13	Policy 2	TR/mm-2 change to TR/mm-3.1	DRL-91
4.17-15 4.17-18	Circ Objective a. Goal #3	TR/mm-2 change to TR/mm-3.1 The TDM strategies are for the whole project not individual neighborhoods. Restate this finding.	DRL-92
4.17-16 4.17-19 4.17-20 4.17-22	Circ Objective d. Public Transit #2 Park and Ride #1 Pol. Obj. 1.2	TR/mm-2 change to TR/mm-3.1	DRL-93

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4.17 Transportation			
4.17-35	Para 3 Para 7	Collector B is between Hetrick and Sandydale Dr. Add this clarification to the first sentence; Improvements at the intersection of Cherokee Place/Collector A and B will be limited to installation of a County standard driveway apron, ADA path of travel along the back of the driveway, and a 20 foot wide by 20 foot wide paved driveway to transition back to the existing dirt access road.	**DRL-94**
4.17-36		And another bullet that lists improvements for Hetrick and now are being part by the new proposed Collector B.	**DRL-95**
4.17-37	Para 1	Last sentence needs to be deleted. There is no nexus to the extension of Class II bike trail on Thompson Avenue/County Bikeway Goal 1-6 4-17-32-33	**DRL-96**
4.17-37	Para 2	Delete the last phrase. Dana Reserve is providing two transit stops with the project. There is no nexus of this project impacting the existing bus stop located along N. Thompson Avenue. Therefore, there is no reason for this project to be responsible for the maintenance of this bus stop.	**DRL-97**
4.17-39	Para 3	This paragraph should include discussion of new transit route on Frontage Road to connect with the new transit stop in the center of the commercial village and the transit center at Willow Road and Collector A. These new facilities will be part of the overall TDM and will help reduce VMT.	**DRL-98**
4.17-42	TR/mm 3.1	This TDM will be done for the project as a whole, not individual future projects. Delete the second sentence in the MM.	**DRL-99**
4.17-45	TR Impact 7	No mention for future fire station on Collector A.	**DRL-100**

4.19: Utilities/Service Systems			
4.19-3	First bullet	Replace “basin” with “management area”.	**DRL-101**
4.19.3	Para 2	“The NCSD service area is located within the NMMA. The NMMA Technical Group is the court-assigned entity responsible for assessment of groundwater within the NMMA and the ~~basin~~ management **area**.”	**DRL-102**

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4.19: Utilities/Service Systems			
4.19-3	Last Para	The following statement, "Through groundwater supply, the NCSD has self-allocated 2,533 AFY" should be revised to state, **"Based on the average pumping volumes over the five-year period of 2009-13 it has been determined that the historic average maximum pumping volume is 2,533 AFY".**	**DRL-103**
4.19-4	Last Para	Delete the first sentence and replace with the following: **The 2,167 AFY is of the NCSD allocation of the total 3,000 AFY of NSWP and accounts for the sale of 833 AFY to GSWC and the Woodlands Mutual Water District.**	**DRL-104**
4.19-36	USS Impact 3	The impact statement incorrectly suggests that there may not be adequate water supplies for the project, but this suggestion is contradicted by the analysis that follows. More specifically, the information following this misleading impact statement cites the WSA and the NCSD UWMP, which clearly state that there is sufficient water to serve the DRSP. This impact statement should be rewritten to avoid the misleading suggestion that water supplies may not be adequate.	**DRL-105**
4.19-37 4.19-38	Para 1 Last Para	Not 11 acres public park, reword to 10-acre public park and 1-acre equestrian staging area.	**DRL-106**
4.19-37 4.19-41	Table 4.19-19 Table 4.19-21	This table is out of date and only reflects 1270 units. It should be updated to 1,289, as reflected in the DRSP December 2021.	**DRL-107**
4.19-39	USS/mm 3.1	This MM is redundant. The annexation to the district will include a contract assuring water for the whole project and there is no need to have each neighborhood receive a new "can and will serve letter". Delete this MM.	**DRL-108**
4.19-48	Para 1	Cumulative - Delete reference to additional service letters for each project.	**DRL-109**

4.20: Wildfire			
4-20.16	Para 2 Line 10	Please delete the words "fire water storage". This project will be served by NCSD and will not have any on-site water storage tanks.	**DRL-110**

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Chapter 5: Alternative Analysis			
5.17	Para 2	Traffic impacts the region of Tefft Street will continue to **increase without the Frontage Road connection** as other areas of Nipomo develop. Please note this in this paragraph.	DRL-111
5.17	Para 4	As noted in the NCSD reports there are many needed infrastructure improvements that the existing residents of Nipomo will have to pay for if DRSP is not approved. Also, the residents would have to pay increased water bills for the water NCSD is contracted to take. This would be a huge negative impact on the community of Nipomo and should be noted in this paragraph.	DRL-112
5.18	Para 1 Line 10	Collector B would connect "Pomeroy" to Willow Road.	DRL-113
5.20	Para 3 Line 9-11	This sentence should be deleted and replaced with this sentence "The DRSP is the Guiding Document for this area with provisions for development and architectural design". The only aesthetic impacts are those along US Highway 101.	DRL-114
5.31	Para 1	This paragraph needs to include the following sentence. **"This Alternative will not provide land donated for the day center, affordable housing, Cuesta College, transit center, and the fire station."** **Also this Alternative** is described as having 60.8 acres of commercial land available for development of commercial and light industrial uses. At typical development intensity assuming 30% land coverage by buildings there could be approximately 795,000sf of building area. This would be in addition to residential use potentially as high as 535 MF residential units. Using the same job generation rate as the project would result in Alt. 2 providing 1088 jobs or 816 more than the project but with fewer housing units. The evaluation assumes VMT would be reduced through less commuting from the project site but offers no analysis to demonstrate this. What if the jobs are taken by residents of other nearby communities such as Santa Maria and commuting miles, which would therefore result in an increase in a "reverse commute" into the site? Then AQ, VMT and GHG would increase relative to the project. The table 5.3 needs to be revised to reflect these increased impacts.	DRL-115

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Chapter 5: Alternative Analysis			
5.37	Para 3	As noted in the NCSD reports there are many needed infrastructure improvements that the existing residents of Nipomo will have to pay for if DRSP is not approved. Also, the residents would have to pay increase water bills for the water NCSD is contracted to take. This would be a huge negative impact on the community of Nipomo and should be noted in this paragraph. This paragraph needs to include the actual water use for this mix of uses.	DRL-116
5-38	Para 2	This paragraph should also note that Alternative 2 would not include affordable housing, day care, Cuesta College, transit center, and fire station. Also, would not meet the infrastructure polices required to be annexed to NCSD.	DRL-117
5-43	Para 6	Add an additional line that states: "This Alternative will not provide any affordable housing units or workforce housing as the large lots will be designed for upper income level households. This Alternative would have negative impacts from an environmental justice perspective compared to the proposed project because it does not provide wide variety and diverse housing."	DRL-118
5-46	Para 3	This analysis states that this Alternative would have the same impacts on biology as the original project. However, there is no way to know how this Alternative would avoid oak trees and other plants as there is no requirement for dedication of open space except for the 49.8 acres. The 195.3 acres would be owned by private landowners that could do what they want within their rural estate lots including raising animals, vineyards, orchards, and private farms. This is a major increase in the impact on the biological resources on the site when compared to the proposed project.	DRL-119
5-48,-49	GHG	The VMT per capita would increase since there will not be any neighborhood serving commercial uses or jobs on the project. Just because there are fewer housing units does not justify a conclusion that there will be less GHG. In fact, there will be higher per capita GHG impacts with larger homes, and more travel for daily needs. This would likely result in an increase in impacts to GHG on a per capita basis.	DRL-120

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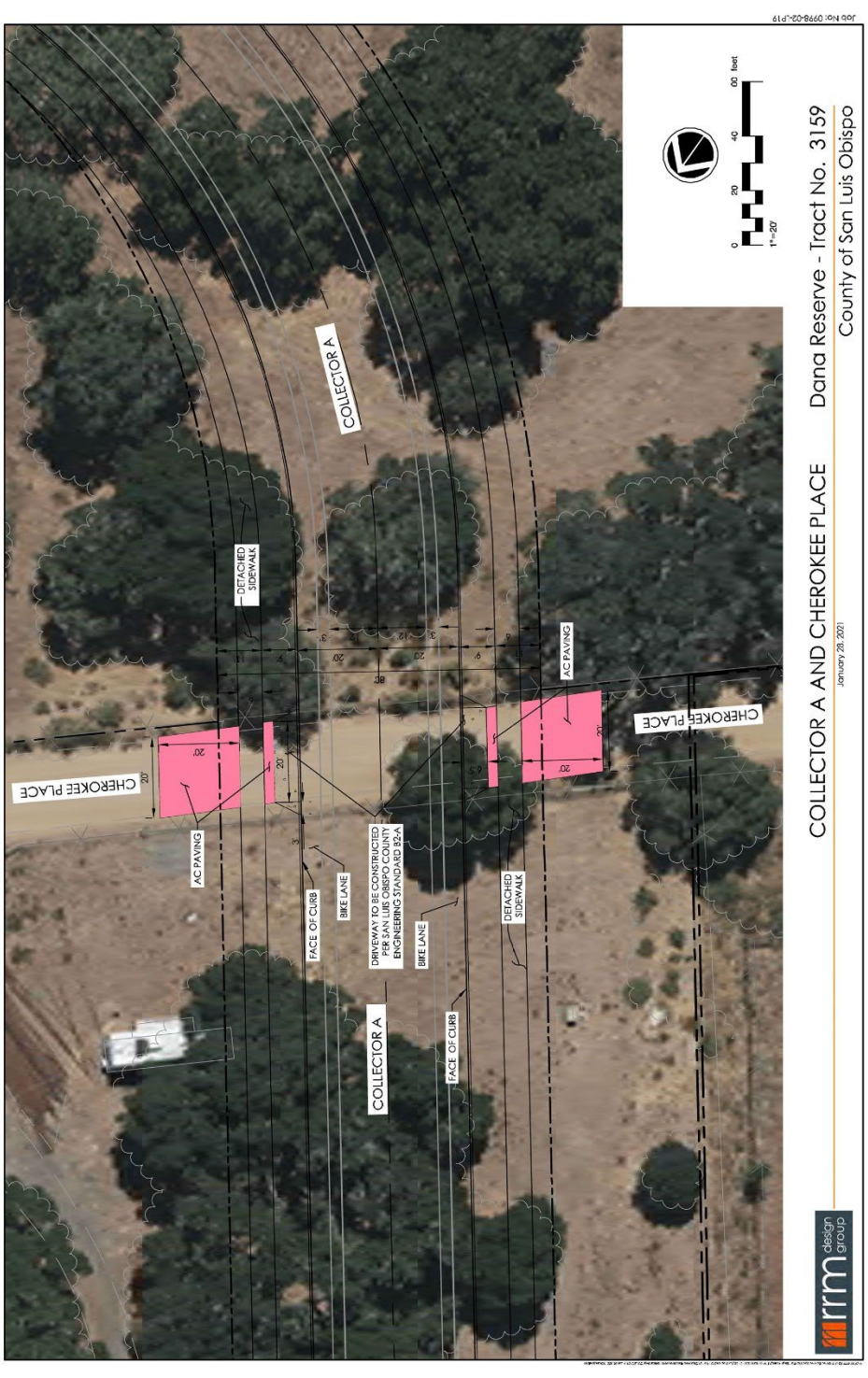
Chapter 5: Alternative Analysis			
5-50	Para 3	This Alternative has potentially greater inconsistencies than the proposed project with many of the Goals and Policies of the General Plan, including the Land Use Element, the SCAP and, most importantly, the Housing Element. Just because an Alternative has fewer lots does not make it a superior alternative. In fact, it is substantially worse because of the many more inconsistencies this Alternative has with County policies.	DRL-121
5-52	Para 3	This section needs to be clear that there is substantial uncertainty as to whether the proposed trail amenities could be developed or maintained. The proposed project anticipates that these trail amenities would be open to the public but maintained by the HOA in the DRSP. With so few proposed homes in this Alternative, there is no way that the HOA would be able to carry the cost of seven miles of trails. Therefore, either the trails will not be built, or the County would have to take responsibility for the long-term maintenance of these trails. This is an increase in impacts for recreation.	DRL-122
5-53	Para 1, 2	This section states that Alternative 3 would include the trails systems proposed in the DRSP. As noted above, please note that most, if not all, of the proposed trail will not be installed because the County will have to maintain them. Please change the first sentence in paragraph 2: "Since the number of units would range from <u>78 to 390 residential "estate" dwellings...</u>" The VMT rates on a per capita basis will be higher with this Alternative because there is no commercial in the area to provide for daily needs. This Alternative has an increase impact on VMT and traffic impacts.	DRL-123
5-54	Para 1	This section needs to calculate the water use for this Alternative. It will be important to include the water use for these large homes and lots for irrigation. Most lots over 20,000 sq ft use between .5 and 1.0 AFY, and it is unclear where this water would come from without sufficient demand and infrastructure to permit annexation into NCSD's service area, as well as due to limitations on groundwater pumping.	DRL-124

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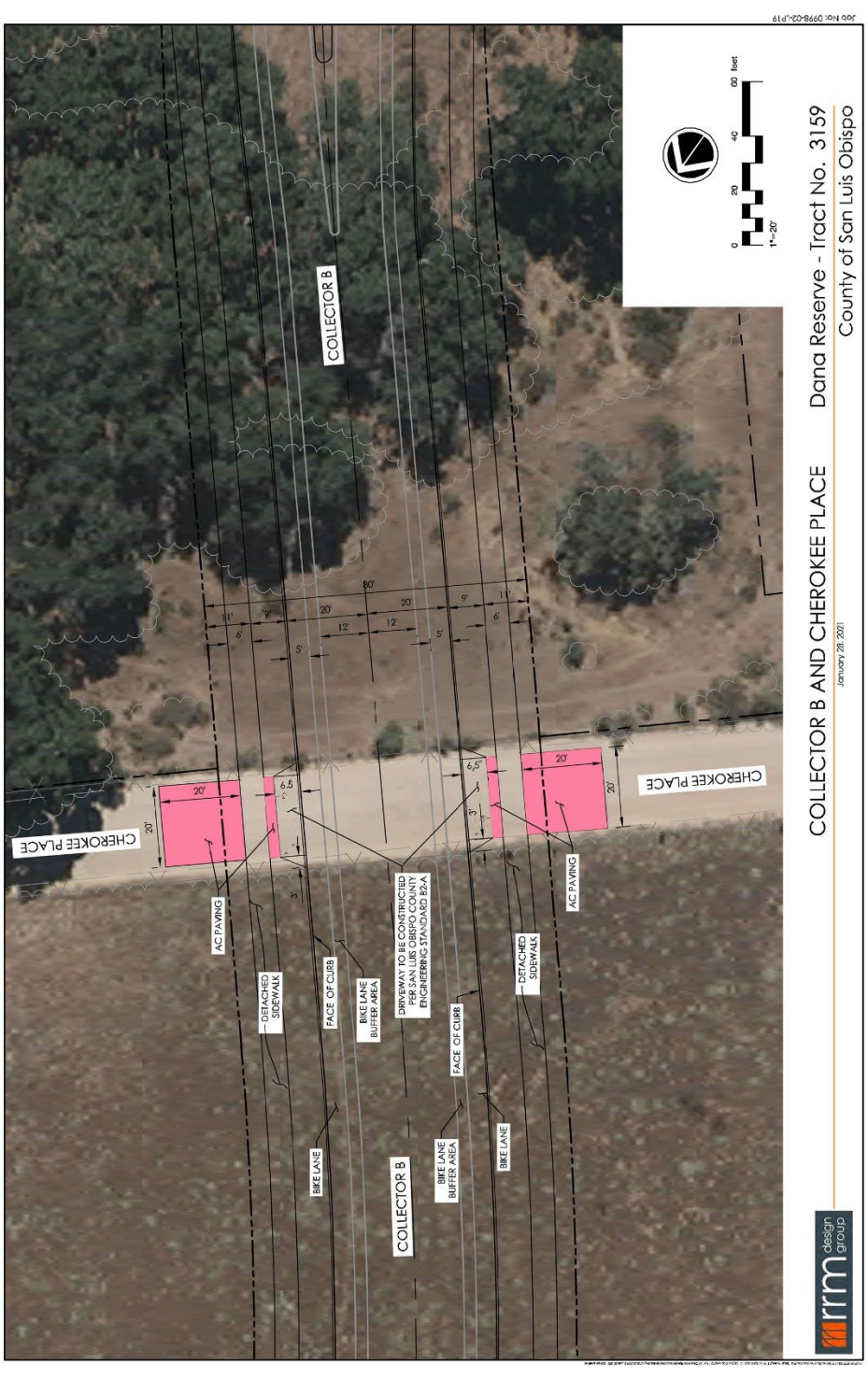
Chapter 5: Alternative Analysis			
5-55	Alternative 4	This description needs to include about 15 acres for private roads. This road acreage would reduce land for housing or open space. This Alternative is also short for park land by 2 acres. This Alternative relies on access from Hetrick for many units and this access was not reviewed in the EIR or supported by the number of landowners along this road. In Table 5-3 this Alternative would have increased in impacts on Recreation and Transportation.	**DRL-125**
5-79	Para 2	Alternative 3 does not include commercial development. The third sentence needs to be corrected as Alternative 3 has fewer units than Alternative 2. Line 6 and 7. As discussed above most of these impact increase on a per capita basis with this alternative and the land use and housing impact are increased by only providing for estate lots. Overall, Alternative 3 cannot be considered an environmentally superior alternative and is not a superior project based on environmental justice concerns.	**DRL-126**
	Para 3	Line 2: most of the trails will not be developed because of the long-term maintenance costs. Line 4: Alternative 3 does not provide for a diversity of housing types. Line 6-7: does not save water on large houses and larger lots, this reduced project would not be annexed to the NCSD. Please delete these items in the second sentence and add them to the third sentence. Line 13: this sentence is incorrect as this Alternative will not help meet the diversity of housing prices and rents required to meet the County RHNA allocation. The two conclusion sentences are incorrect as Alternative 3 has more increase impacts and more inconsistency with the and DRSP.	**DRL-127**

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Chapter 6: Other CEQA Consideration			
6.2	Para 2	Also include Pomeroy as another assess to this site. Section 6.1.3 How is preparation of a required Specific Plan for an area designated as a location for future growth a precedent setting Action? The language requiring the Specific Plan prior to development identifies commercial uses as an objective of the Specific Plan – how can these types of uses when proposed in the required DRSP be considered precedent setting?	**DRL-128**
6.3	Para 1	Why is this a Class 1? The discussion above indicates that this will be an infill project with annexation to NCSD and Nipomo URL. This project is consistent with SCAP, RHNA, and many other policies. Please remove this Class 1 impact.	**DRL-129**


COLLECTOR A AND CHEROKEE PLACE
Dana Reserve - Tract No. 3159
County of San Luis Obispo
January 29, 2021
COLLECTOR A
CHEROKEE PLACE
DETACHED SIDEWALK
AC PAVING
FACE OF CURB
BIKE LANE
DRIVEWAY TO BE CONSTRUCTED PER SAN LUIS OBISPO COUNTY ENGINEERING STANDARD B2-A
rrm design group

DRL-130



DRL-130
(cont'd)

RMM
REMY | MOOSE | MANLEY
LLP

James G. Moose
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Sent by Email

March 23, 2022

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DRL-130
(cont'd)

Re: Dana Reserve Project: proposed Burton Mesa Chaparral Mitigation

Dear Mr. Singewald and Ms. Guetschow:

On behalf of NKT Development, LLC, applicant for the proposed Dana Reserve Specific Plan (the Project), I am writing to address the legal adequacy and sufficiency of the applicant's proposed mitigation for the Project's impacts on Burton Mesa Chaparral habitat. This mitigation proposal is set forth in the Biological Report for Dana Reserve, Nipomo, San Luis Obispo County (September 2021) (Biological Report), on pages 103 and 104 and is summarized below. Additional biological justification for the measure is described in the enclosed March 23, 2022, Memorandum from LynneDee Althouse of Althouse & Meade, Inc., to Jim Moose (Althouse Memorandum). Also enclosed is a set of graphic images of the onsite mitigation plan for the Project, created by the PleinAire Design Group.

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In the pages that follow, I explain the following: (i) that the County of San Luis Obispo (County), in formulating mitigation for this habitat type, is required to account for the degraded quality on the habitat as it currently exists on the Project site, and is periodically modified for the worse through historic and ongoing agricultural practices; (ii) that mitigation under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) is constrained by constitutional principles that set upper limits on what can be imposed on applicants (namely, that mitigation can be no more than what is "roughly proportional" to the impacts at issue); (iii) that CEQA tools for mitigating biological resource impacts include compensatory strategies such as conservation, enhancement, restoration, and recreation; and (iv) that here a "no net loss of habitat *quality*" performance standard using these strategies is the most logical and appropriate way for addressing mitigation for the degraded habitat in question.

ANALYSIS

A. The Applicant's proposed mitigation strategy

DRL-130
(cont'd)

As is explained in the Biological Report, "approximately 36 acres of the 295.3-acre Project site (12 percent) is degraded Burton Mesa chaparral, with less than two percent cover of representative species. This habitat has been subjected to periodic mowing, mulching, grubbing, and brush-raking[1] as part of the historical ongoing agricultural operation since at least the 1930s and is currently in poor condition, with low cover of constituent species. The proposed development will remove 35 acres (97 percent) and preserve 1 acre (3 percent) of this habitat onsite." (Biological Report, p. 102.) "Onsite mitigation opportunities are limited, and a fire regime to sustain diverse characteristic species within maritime chaparral is not practical in a suburban setting[.]"

[1] A brush rake is a device with fixed metal blades placed on the front or rear of a tractor for the purposes of facilitating the removal of larger stem plants from the soil in order to clear out brush and other unwanted plants. The brush rake typically leaves surface grasses undisturbed.

(*Ibid.*) The total onsite area covered by characteristic shrub and herbaceous species is less than three percent of the mapped habitat boundary. Rare taxa such as sand mesa manzanita have been routinely mowed and grubbed out for the last 90 or more years (see photos in Appendix F of Biological Report). During botanical surveys in 2018 and 2019, shrubs were generally less than two feet tall and less than three feet in diameter.

The applicant proposes to mitigate for loss of this degraded Burton Mesa Chaparral habitat through a mitigation measure that would achieve a performance standard of *no net loss of habitat quality*. The measure would achieve this standard through a combination of conserving, enhancing, restoring, and/or re-creating from 8.8 acres up to 70 acres of Burton Mesa chaparral at the following mitigation ratios:

- conserve currently unprotected Burton Mesa Chaparral habitat in excellent condition at a 1.5:1 ratio;
- enhance protected Burton Mesa Chaparral habitat currently in moderate to poor condition at a 2:1 ratio;
- restore damaged protected Burton Mesa Chaparral habitat at a 0.5:1 ratio; and/or
- recreate high-quality Burton Mesa Chaparral at a 0.25:1 ratio in appropriate habitat that has been completely disturbed (e.g., abandoned farmland).

DRL-130
(cont'd)

Under this proposed approach, for example, the applicant could do any of the following: (i) conserve unprotected Burton Mesa chaparral habitat in excellent condition at a 1.5:1 ratio, for a total of 52 acres; (ii) enhance protected Burton Mesa chaparral currently in moderate to poor condition at a 2:1 ratio, for a total of 70 acres; (iii) restore damaged protected Burton Mesa chaparral habitat at a 0.5:1 ratio, for a total of 14 acres; or (iv) recreate high-quality Burton Mesa chaparral at a 0.25:1 ratio, for a total of 8.8 acres. Other outcomes would also be possible, depending on how conservation, enhancement, restoration, and recreation strategies are pursued and combined. Under any scenario, however, the final outcome would have to avoid any net loss of habitat quality.

As indicated above, the mitigation measure does *not* assume that mitigation for each acre of *degraded* habitat necessarily requires the conservation, enhancement, restoration, and/or recreation of one or more acres of *high-quality* habitat. Rather, the performance standard that the mitigation seeks to achieve is no net loss of habitat *quality*, using existing on-site conditions as the baseline for measurement. This outcome could be achieved through four possible strategies, together or in combination. The outcome could be achieved by conserving currently unprotected excellent habitat acreage at a ratio of 1.5 to 1 or by enhancing protected habitat acreage in moderate or poor condition at a ratio of 2 to 1. Both of these employ ratios of greater than 1 to 1.

The same outcome – no net loss of habitat *quality* – could also be achieved, however, by restoring and/or re-creating high-quality habitat at acreage ratios of lower than 1 to 1. Restoration of damaged habitat can achieve this outcome at a ratio of 0.5 to 1, while the recreation of high-quality habitat in completely disturbed areas can achieve the outcome with a ratio of only 0.25 to 1.[2]

DRL-130
(cont'd)

[2] The Althouse Memorandum, on pages 6 and 7, summarizes the effects of the four different approaches as follows:

> Chaparral habitat, as opposed to individual plants, may be mitigated by conservation of intact habitat, enhancement of weedy or lightly damaged protected habitat, restoration of degraded habitat, or re-creation of high-quality habitat. Depending on the approach taken, a ratio of 1 to 1 or higher may not be biologically necessary, given the low function and values of existing habitat being mitigated.
>
> When ***conserving*** excellent but currently unprotected high-quality habitat as mitigation for the loss of degraded habitat, a 1.5 to 1 ratio will avoid loss of overall habitat quality because conservation with management for the benefit of unique habitat functions will offset the loss of highly degraded habitat. A ratio of more than 1:1 is needed because conservation does not produce new habitat, though it does provide legal protection for high-quality habitat against the possibility of future loss or degradation from lawful activities. The conserved habitat will also be managed to ensure that its high quality will be maintained.
>
> When ***enhancing*** moderate to poor quality protected habitat as mitigation for the loss of degraded habitat, a 2 to 1 ratio will avoid loss of overall habitat quality because unique habitat functions that support chaparral dwellers is substantially improved by reducing invasive species cover, and/or reducing access that causes disturbance that otherwise

This flexible approach, which includes ratios of less than 1 to 1 for habitat restoration and recreation, is both permissible and fully sufficient under CEQA and the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.). In contrast, an approach that required the conservation of a full acre of high-quality habitat for every lost on-site acre with any habitat on it, regardless of its existing quality or physical extent, would be excessive. Such an approach would not be "roughly proportional" to the impacts being mitigated, but instead would require the applicant to create a substantial environmental benefit in the form of a large net increase in protected high-quality habitat. Such an outcome would be inconsistent with constitutional limitations imposed on lead agencies when such agencies formulate mitigation measures under CEQA.

These constitutional limitations, as well as the judicial precedents that explain them, are set forth in the CEQA Guidelines as follows:

> Mitigation measures must be consistent with all applicable constitutional requirements, including the following:

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diminishes chaparral habitat functions and values. The 2 to 1 ratio accounts for the fact that the habitat is already protected, though it is in poor to moderate condition.

When ***restoring*** damaged protected habitat as mitigation for the loss of degraded habitat, a 0.5 to 1 ratio will avoid any loss of overall habitat quality because weed removal in concert with replanting and routine maintenance for the benefit of habitat functions significantly improves habitat functions and values from a degraded or damaged condition. A ratio of less than 1 to 1 is sufficient because restoration of damaged protected habitat will substantially improve the condition of such habitat. An acre of restored habitat will have substantially more biological value than an acre of degraded habitat. A half-acre of restored habitat would function at least as well, if not better than an acre of degraded habitat.

When ***recreating*** high quality habitat on completely disturbed land such as abandoned farmland, a 0.25 to 1 ratio will avoid any loss of overall habitat quality because conversion from completely degraded conditions to a highly functioning habitat transforms the land from zero chaparral habitat value to high quality chaparral habitat. A ratio of less than 1 to 1 is sufficient because recreating high quality habitat where none currently exists will result in the creation of all new habitat where it had been eliminated. A quarter-acre of recreated habitat will have significantly more value than no habitat at all.

> (A) There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987); and
>
> (B) The mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994). Where the mitigation measure is an *ad hoc* exaction, it must be "roughly proportional" to the impacts of the project. *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854.
>
> (Cal. Code Regs., tit. 14, div. 6, ch. 3 [CEQA Guidelines], § 15126.4, subd. (a)(4).)

I will discuss in detail below the specific facts and principles forth in the cases cited here – *Nollan*, *Dolan*, and *Ehrlich*. I will then discuss CEQA case law on mitigation measures for biological resource impacts. But first I will lay out principles relevant to the "baseline" that the County must use first in assessing the Project's impacts and then in formulating mitigation to address those impacts.

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B. The starting point for impact analysis in an EIR is existing conditions at the time of issuance of a Notice of Preparation; and, in assessing those existing conditions, lead agencies should account for historic fluctuations in land conditions.

"An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." (CEQA Guidelines, § 15125, subd. (a).) "The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." (*Ibid*.) "Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation [NOP] is published, …, from both a local and regional perspective." (*Id.*, subd. (a)(1).)

Where such existing conditions reflect the environmental effects of past economic activities, such effects are appropriately reflected in the baseline, and need not, and generally cannot, be conceptually rolled back to try to capture a hypothetical more pristine prior condition. (See, e.g., *Citizens for East Shore Parks v. State Lands Com.* (2011) 202 Cal.App.4th 549, 558-562 [the EIR for the renewal of a lease for operating a marine terminal properly assumed ongoing terminal operations as the environmental baseline].)

This obligation to address existing conditions, whatever they are, applies even where (as is *not* the case here) the past activities in question may have been unlawful (See, e.g., *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1451-1453 [the baseline for an EIR for a proposed quarry project properly included floodplain conditions that had been altered in manner than United State Fish and Wildlife Service contended had been in violation of the Clean Water Act]; *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278-1281 [in considering with to grant a use permit for an existing airport that had been built and operated illegally, the lead agency properly used a baseline that reflected the existence of the airport]; and *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 370-371 [an EIR for an illegally built playground properly assumed the playground as part of the baseline].)

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The principle that CEQA takes the environment as it finds it – even if it is in a highly degraded condition – is illustrated by the outcome in *North Coast Rivers Alliance v. Westlands Water Dist.* (2014) 227 Cal.App.4th 832. There, the petitioners challenged the use of a Class 1 categorical exemption for a two-year interim water contract between the United States Bureau of Reclamation, on the one hand, and Westlands Water District and "its related distribution districts," on the other. The interim contract continued water deliveries in substantially the same form and amounts that the water districts had been receiving since the 1960s, prior to the effective date of CEQA (1970).

The petitioners argued that these historic deliveries had contributed to substantial environmental degradation in the Sacramento-San Joaquin Delta, from which the water supplies were exported. Petitioners pointed to "evidence that [Central Valley Project] pumping in the Delta in conjunction with that of the state water project contributes to factors that jeopardize or threaten the continued existence of the delta smelt and certain salmon species, the numbers of which are steadily declining; and also that the continued use of irrigation water in the area of Westlands Water District is causing groundwater and soil to be increasingly degraded over time to the point that agricultural land must be retired." (227 Cal.App.4th at p. 876.) In response, however, the court reasoned that, "[a]lthough the matters raised by petitioners are genuine concerns, the evidence was inadequate to show that the particular project under consideration (i.e., the 2012 interim renewal contracts) had a potential to bring about a substantial adverse change to the environment." (*Id*. at pp. 873–874.) "[T]he particular activities challenged by petitioners—i.e., the large volume of CVP water distributed to Water Districts and used for irrigation purposes on lands within Water Districts' boundaries—were clearly part of the existing environmental baseline for Water Districts' ongoing operations." (*Id*. at p. 874.)[3]

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Another important legal principle in this context is that, in assessing what constitute "existing conditions," a lead agency can and should account for any historic fluctuations in the physical conditions on a project site resulting from cyclical land management practices. The case law regarding this principle, discussed below, is relevant here due to the normal cycles of agricultural management on the Project site, which

[3] See also *CREED-21 v. City of San Diego* (2015) 234 Cal.App.4th 488, 504-507 (physical work done on an eroding slope without CEQA compliance under the statutory exemption for actions to prevent emergencies was part of the environmental baseline for subsequent discretionary permits subject to CEQA); and *World Business Academy v. California State Lands Commission* (2018) 24 Cal.App.5th 476, 500-501 (upholding the application of the Class 1 exemption to the extension of a lease for the Diablo Canyon nuclear power plant, noting that the environmental risks associated with nuclear power were part of the environmental baseline).

involves periodic mowing, mulching, grubbing, and brush-raking of the already degraded Burton Mesa Chaparral habitat and the intentional uprooting of the plants that contribute to such habitat.

These agricultural practices, which have been occurring for many decades, are intended to create better, grassier grazing conditions for cattle. These practices are totally lawful in the absence of any discretionary land use controls imposed by the County, as the practices do not occur on land, or involve species, that implicate federal or state environmental statutes such as the Endangered Species Act (ESA) (16 U.S.C. § 1531 et seq.), Section 404 of the Clean Water Act (33 USC §1344), the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.), or Fish and Game Code provisions governing the substantial obstruction of the bed, channel, or bank of any river, stream or lake (Fish & G. Code, § 1602). These activities would also occur going forward should the County ultimately choose not to allow development on the Project site.

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As the Althouse Memorandum explains (see pp. 1-3), none of the plant species on the Project site that are characteristic of Burton Mesa Chaparral are formally listed as endangered, threatened, or rare under either ESA or CESA. Notably, unlisted plants identified under the Rare Plant Ranking System of the California Native Plant Society are not legally protected per se, though they are often treated by lead agency biologists as being *de facto* "endangered," "threatened," or "rare" for purposes of *CEQA*. (See CEQA Guidelines, § 15380 [unlisted species can be treated as endangered, threatened, or rare in CEQA documents even in the absence of formal listing].) Such plants, then, are only protected under CEQA, which does not apply to agricultural activities that require no permits from any local or state authority. (See *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 44-48 [section 15380 did not require the respondent lead agency to make a "specific finding or determination as to whether" a particular species "was 'rare' or 'endangered'"]; see also *id*. at pp. 41-42 [CEQA does not "requir[e] public agencies to

deny approval of any project where the perpetuation of rare or endangered species on the site cannot be guaranteed"].)

The legal principle that a lead agency may consider fluctuating past conditions in attempting to ascertain existing conditions is set forth in detail in the California Supreme Court's seminal decision in *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310 (*Communities for a Better Environment*). The principle has also been explored in Court of Appeal decisions issued subsequent to that Supreme Court decision.

In *Communities for a Better Environment*, the high court set aside a Mitigated Negative Declaration (MND) adopted by an air quality management district for a proposal by an oil company, ConocoPhillips, to modify its air permits for an existing petroleum refinery in order to meet new regulations involving motor vehicle diesel fuel. The project proposed, among other things, a substantial increase in the operation of an existing cogeneration plant and four boilers. The cogeneration plant and boilers were subject to prior permits that authorized a maximum rate of heat production for each piece of equipment. In actual practice, however, these maximum permitted rates had never been reached. In adopting an MND, the air district acknowledged that the increased operation of steam generation equipment would cause additional nitrogen oxide emissions beyond historic and existing levels, but did not consider these increases to be attributable to the project for CEQA purposes because the increases did not exceed the maximum rate of emissions authorized under the existing permits. Instead, the district treated the additional nitrogen oxide emissions arising from the increased plant operations to be within previously permitted levels as part of the baseline. (*Id.* at pp. 316–319.)

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The Supreme Court determined that the air district erred by measuring the air pollutant emissions of the proposed project against hypothetical emissions at full operation under existing permits. (*Id*. at p. 322.) The court held that the district should

have compared the project to the existing physical conditions, not hypothetical conditions allowed under the existing permit. (*Id*. at p. 321.) In this case, the air district's baseline was premised on simultaneous operation of all boilers at their maximum permitted capacity, which was not a realistic description of existing conditions based on the record. This was an "illusory" comparison of the project against what could happen, rather than against what was actually happening. (*Id.* at p. 322.)

The air district and Conoco Phillips argued that daily fluctuations in refinery operations made it difficult to use annual averages to arrive at an accurate baseline. Although the court rejected the notion that such difficulties justified the use of permitted but unrealized levels of air pollution as the baseline, the court was cognizant of the need to account for fluctuations in some fashion and thus did not impose a rigid rule regarding how to estimate baseline conditions. "Neither CEQA nor the Guidelines mandates a uniform, inflexible rule for determination of the existing conditions baseline. Rather, an agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence." (*Id*. at p. 328.) The court more fully explained the need for flexibility in ascertaining "existing conditions" as follows:

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> the date for establishing baseline cannot be a rigid one. Environmental conditions may vary from year to year and in some cases it is necessary to consider conditions over a range of time periods." [Citation.] In some circumstances, peak impacts or recurring periods of resource scarcity may be as important environmentally as average conditions. Where environmental conditions are expected to change quickly during the period of environmental review for reasons other than the proposed project, project effects might reasonably be compared to predicted conditions at the expected date of approval, rather than to conditions at the time analysis is begun. [Citation.] A temporary lull or spike in operations that happens to occur at the time environmental review for a new project begins should not depress or elevate the baseline; overreliance on short-term activity averages

> might encourage companies to temporarily increase operations artificially, simply in order to establish a higher baseline.
>
> (*Id*. at pp. 327–328.)

Two cases decided in the aftermath of *Communities for a Better Environment* illustrate how these legal principles should be applied in practice.

In *North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94 (*North County Advocates*), the Court of Appeal upheld the use of a shopping center's historical full occupancy as a proper baseline for the EIR's analysis. The case involved a proposal to renovate a former Robinsons-May store and other small portions of a shopping center. The EIR's baseline for traffic impacts treated the Robinsons-May store as fully occupied, even though the store had been vacated years earlier and had been only periodically occupied since then. (*Id*. at p. 96.) The court held that substantial evidence supported the respondent city's determination of the traffic baseline because it was based on "*recent historical use*" and was consistent with the property owner's right to fully occupy the Robinsons-May space without further discretionary approvals. (*Id.* at pp. 105–106.) The court reasoned as follows:

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> [U]nlike *Communities for a Better Environment*, the City's selection of a traffic baseline that assumed full occupancy of the Robinsons-May space was not merely hypothetical because it was not based *solely* on Westfield's entitlement to reoccupy the Robinsons-May building "at anytime without discretionary action," but was also based on the actual historical operation of the space at full occupancy for more than 30 years up until 2006. * * * [T]he Robinsons-May space was less occupied from 2007 through 2009 (two retail users occupied part of it from August 2006 through December 2007, and two others occupied part of it from August through November in 2008 and in 2009). We view this fluctuating occupancy—which is "the nature of a shopping center"—as akin to the varying oil refinery operations in *Communities for a Better Environment* that led the Supreme Court to recognize that agencies have discretion "'to consider conditions over a range of time periods' " to account for a "temporary lull or spike in operations...."

(241 Cal.App.4th at pp. 105-106 [italics original; footnote omitted].)

In S*an Francisco Baykeeper, Inc. v. California State Lands Commission* (2015) 242 Cal.App.4th 202 (*Baykeeper*), another Court of Appeal reached a similar result. That case involved a challenge to the California State Lands Commission's renewal of a lease allowing the continued dredge mining of sand from lands under the San Francisco Bay. (*Id*. at p. 210.) The draft EIR defined the baseline as the volume of sand mined from the lease parcels in 2007, the year the NOP for the EIR was published. Following the close of public comment on the draft EIR, however, the commission determined that changes to the project required recirculation of the draft EIR. Rather than using the year 2007 as a baseline, the revised draft EIR used the *average annual volume* of sand mined in the proposed project area per year from 2002 to 2007. (*Id*. at p. 212.) The petitioner argued that the revised draft EIR's baseline was inadequate because it did not reflect the fact that sand mining levels dropped substantially after 2007. The Court of Appeal concluded, though, that substantial evidence supported the commission's use of the five-year average baseline. (*Id*. at pp. 218–219.) For instance, the final EIR's responses to comments explained that "inclusion of the unusually low mining volumes in years after NOP publication during the economic downturn … would distort the baseline by understating the overall levels of mining in years prior to the expiration of the previous lease and commencement of EIR preparation." (*Id*. at p. 219.) This conclusion was supported by statistical information in the record, including data from the California Geological Survey showing that California's economic downturn during 2007 contributed to a significant decrease in both the production and value of construction aggregate, including sand. (*Id*. at p. 218.) The court therefore upheld the revised EIR's use of a five-year average baseline.

In late 2018, the California Natural Resources Agency updated CEQA Guidelines section 15125, subdivision (a)(1), to reflect the principles and cases described above. The pertinent language in that provision now provides that "[w]here existing conditions

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change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."

In light of *Communities for a Better Environment*, *North County Advocates*, and *Baykeeper*, as well as the current language of CEQA Guidelines section 15125, subdivision (a)(1), the County, in identifying "existing conditions" on the Dana Reserve Project site, should take full account of the physical conditions that exist there immediately following agricultural practices that destroy the plants that are characteristic of Burton Mesa Chaparral. These "high impact" baseline conditions are analogous to both the fully occupied shopping center in *North County Advocates*, which reflected higher traffic levels than would occur in the absence of full occupation, and the high historic levels of sand mining in *Baykeeper*, which represented a more degraded baseline than the lower levels of mining that occurred after 2007 in that case.

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Taken together, all of the legal precedents described above leave no doubt that, in assessing the significance of impacts to Burton Mesa Chaparral habitat on the Project site, the County must take full account of the degraded, low-quality character of that habitat, including its conditions immediately after periodic agricultural practices that uproot and destroy the plants associated with Burton Mesa Chaparral habitat. As noted above, these practices would continue if the County Board of Supervisors should choose to deny any development on the Project site.

As explained in detail below, moreover, the County, in formulating mitigation measures for impacts to such degraded habitat, may require no more from the applicant than is roughly proportional to the nature and extent of such impacts.

C. Nollan, Dolan, and Ehrlich

As indicated earlier, CEQA Guidelines section 15126.4, subdivision (a)(1)(4), expressly incorporates principles set forth in three leading cases from the United States Supreme Court and the California Supreme Court on the constitutional limitations on agencies' authority to extract various kinds of conditions on private project applicants during permitting processes. The facts of all three of these cases are illuminating with respect to the issues at hand.

In *Nollan v. Coastal Commission* (1987) 483 U.S. 825 (*Nollan*), the United States Supreme Court declared invalid a condition by which the California Coastal Commission had required a property owner to dedicate an easement allowing public access across beachfront land as "mitigation" for the effects of a coastal development permit allowing the owner to replace a small residential structure with a larger one. In so holding, the court explained that, in order for a condition of approval requiring a property owner to give up land to be valid, a "nexus" must exist between the condition and a purpose that would justify denial of the permit (*i.e.,* the condition must be addressed to the same harm that would justify denial). (483 U.S. at pp. 834–837.) [4]

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The court invalidated the condition requiring a dedication of property *along* the beach (rather than *to* the beach) because the landward visual impacts associated with the property owner's construction of a new home in no way created the need for such

[4] The court also stated that any such condition must also "substantially advance legitimate state interests." (483 U.S. at p. 834.) In *Lingle v. Chevron U.S.A. Inc*. (2005) 544 U.S. 528, 540-542, however, the Supreme Court subsequently disapproved this first part of the *Nollan* "takings" analysis, which had first been announced in *Agins v. City of Tiburon* (1980) 447 U.S. 255, 260. The court in *Lingle* explained that "the language the Court selected [in *Agins*] was regrettably imprecise. The 'substantially advances' formula suggests a means-ends test: It asks, in essence, whether a regulation of private property is effective in achieving some legitimate public purpose. An inquiry of this nature has some logic in the context of a due process challenge, for a regulation that fails to serve any legitimate governmental objective may be so arbitrary or irrational that it runs afoul of the Due Process Clause. *** But such a test is not a valid method of discerning whether private property has been 'taken' for purposes of the Fifth Amendment." (544 U.S. at p. 542.)

"lateral" access. As the court explained, "[i]t is quite impossible to understand how a requirement that people already on the public beaches be able to walk across the Nollans' property reduces any obstacles to viewing the beach created by the new house." (483 U.S. at p. 838.) The court indicated, however, that the commission might have properly imposed a condition "that would have protected the public's ability to see the beach notwithstanding construction of the new house." (*Id.* at p. 836.)

In *Dolan v. City of Tigard* (1994) 512 U.S. 374 (*Dolan*), the court addressed a question left unanswered in *Nollan*. Whereas *Nollan* addressed the permissible *purposes* of requiring a land dedication as a condition of project approval, *Dolan* focused on the related but distinct question of just *how extensive* the burdens of such a condition may be (assuming the purpose is legitimate). The challenged agency action in *Dolan* was the issuance of a building permit for the expansion of a commercial development. The defendant city required the property owner to dedicate to the city certain land lying within the 100-year floodplain for the construction of a storm drainage system, and to dedicate a 15-foot strip of land adjacent to the floodway for a pedestrian/bicycle pathway. (512 U.S. at pp. 379–380.)

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The court recognized the general legitimacy of the purposes addressed by the dedications required of the property owner: the need for flood control to handle runoff from increased pavement; and the need to reduce traffic impacts that might be created by an expanded commercial facility. Thus, to use the language of *Nollan*, there was an "essential nexus" between the actual impacts associated with the development and the purposes of the land dedication required as a condition imposed on the property owner. (*Id.* at pp. 386–388.) The court was therefore required to determine whether "the *degree* of the exactions demanded by the city's permit conditions bear the required relationship to the projected impact of the petitioner's proposed development." (*Id.* at p. 388, italics added.)

In answering this inquiry, the court held that there must exist a "*rough proportionality*" between the extent of the impacts caused by a project approval and the extent to which the exactions actually mitigate such impacts. "No precise mathematical calculation is required, but the city must make some sort of individualized determination that the required dedication is related both in nature and *extent* to the impact of the proposed development." (*Id.* at p. 391, italics added.) In contrast to "most generally applicable zoning regulations," for which "the burden properly rests on the party challenging the regulation to prove that it constitutes an arbitrary regulation of property rights," the case at hand involved "an adjudicative decision to condition petitioner's application for a building permit on an individual parcel" for which "the burden properly rests on the city" to justify the extent of the required dedication. (*Id.* at p. 391, fn. 8.)

After announcing the "rough proportionality" standard, the court proceeded to apply it to the facts in question. Emphasizing that the requirement to dedicate property eliminates a landowner's "right to exclude others," the court held that the respondent city had failed to properly justify the exactions imposed on the landowner. (*Id.* at pp. 392–396.) In closing, the court noted that "[t]he city's goals in reducing flooding hazards and traffic congestion, and providing for public greenways, are laudable, but there are outer limits to how this may be done." (*Id.* at p. 396.)

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In *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854 (*Ehrlich*), the California Supreme Court interpreted and applied *Nollan* and *Dolan* in holding that a city had acted improperly in assessing a $280,000 "recreation fee" against a property owner as a condition of approving a residential project requiring a general plan amendment, specific plan amendment, and rezone. The new development would replace a private club with tennis courts. The court determined that the fee was flawed because the $280,000 required of the applicant was the amount necessary to build new *public* recreational facilities to replace the *private* facilities being "lost" with the project. The city's approach wrongly assumed that the fee should fund the construction of new facilities that would be

open, without further cost, to the public at large. In fact, however, the "lost" facilities were private facilities funded through the marketplace by membership dues. "[U]nder the city's formula, the public would receive, ex gratia, $280,000 worth of recreational facilities the cost of which it would otherwise have to finance through membership fees. *Plaintiff is being asked to pay for something that should be paid for either by the public as a whole, or by a private entrepreneur in business for profit*. The city may not constitutionally measure the magnitude of its loss, or of the recreational exaction, by the value of facilities it had no right to appropriate without paying for." (12 Cal. 4th at p. 883, italics added.)

The *Ehrlich* decision consists of (i) a "plurality opinion" signed by three of the court's seven justices, (ii) a "concurring opinion" authored by Justice Mosk, (iii) a "concurring and dissenting opinion" written by Justice Kennard and joined by Justice Baxter, and (iv) a "concurring and dissenting opinion" penned by Justice Werdegar. Thus, as to some issues, there is no clear majority "holding." As to certain other issues, however, there clearly was general agreement amongst the Justices.

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All members of the court agreed that both the "essential nexus" standard of *Nollan* and the "rough proportionality" standard of *Dolan* applied to the facility replacement fee imposed by the city. (12 Cal. 4th at pp. 881, 887, 903, 912.) Speaking generally, the court concluded that those standards applied to monetary exactions imposed "on an *individual* and discretionary basis." (*Id.* at p. 876, italics added.) The court said that it would decline to apply the rigorous *Nollan* standard, however, to the judicial review of assessments imposed on *numerous* projects via broadly applied *legislative* enactments. The court therefore distinguished between ad hoc exactions imposed on a project-by-project basis, on the one hand, and generally applicable legislative requirements imposed across the board via legislation such as ordinances, on the other hand. (*Id*. at pp. 876.)

In the matter at hand – the mitigation of impacts to Burton Mesa Chaparral habitat due to the Dana Reserve project – the relevant portion of *Ehrlich* is its embrace of the

reasoning of *Nollan* and *Dolan*. The County will impose mitigation for this habitat on an ad hoc, individualized basis as part of the environmental review process for the Project, rather than as a result of any generally applicable County ordinance addressing Burton Mesa Chaparral mitigation. The County's mitigation, then, must meet both the "essential nexus" and the "rough proportionality" requirements discussed above.

D. CEQA Case Law on Mitigation Measures for Biological Resource Impacts

Although, as quoted above, section 15126.4, subdivision (a)(4)(B), of the CEQA Guidelines says that "[t]he mitigation measure must be 'roughly proportional' to the impacts of the project," what this statement really means is that, *at most*, the mitigation for a significant environmental effect must be roughly proportional. While the constitutional principles discussed above preclude *over-mitigatin*g impacts, CEQA stops short of always requiring roughly proportional mitigation, though in practice it is often imposed, particularly where the environmental resources at issue, such as wetlands, are also subject to federal or state statutes or regulations above and beyond CEQA.

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"The goal of mitigation measures is not to net out the impact of a proposed project, but to reduce the impact to insignificant levels." (*Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 529.) "Mitigation measures need not include precise quantitative performance standards, but they must be at least partially effective, even if they cannot mitigate significant impacts to less than significant levels." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 523.)

The definition of "mitigation" found in section 15370 of the CEQA Guidelines includes, among other things, "[r]ectifying the impact by repairing, rehabilitating, or restoring the impacted environment[,]" "[r]educing or eliminating the impact over time by preservation and maintenance operations during the life of the action[,]" and "[c]ompensating for the impact by replacing or providing substitute resources or

environments, including through permanent protection of such resources in the form of conservation easements."

Though not all mitigation measures, to be valid, need to include performance standards, such standards are necessary where many of the crucial details for a mitigation plan are deferred until after project approval. "Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts *specific performance standards* the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure." (CEQA Guidelines, § 15126.4, subd. (a)(1)(B), italics added.)

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One common performance standard that is discussed in CEQA case law is "no net loss" of wetland habitat, which is commonly required, in any event, by the United States Army Corps of Engineers under the Clean Water Act. This approach to CEQA mitigation can generally be termed "compensatory," though it also typically involves the use of conservation easements and the rehabilitation or restoration of former wetlands, along with ongoing maintenance.

In *California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603 (*California Native Plant Society*), the court considered the adequacy of a mitigation measure addressed to mitigate for the loss of vernal pools, a kind of wetland, that were supporting two species of shrimp subject to protection under the Endangered Species Act. The measure was mitigation for "the direct loss of 14.1 acres of vernal pool fairy shrimp habitat" and "15.65 acres of vernal pool tadpole shrimp habitat." (*Id.* at p. 610.) The measure "provided that these direct impacts would be mitigated 'in such a manner that there will be no net loss of habitat (acreage and function) for these species in

the Laguna Formation following implementation of the project.'" (*Ibid*.) Under the measure, "the applicant would be required to 'complete and implement a habitat mitigation and monitoring plan that will compensate for the loss of acreage, function and value of the impacted resources.'" (*Ibid*.) "The plan would have to include '[t]arget areas for creation, restoration and preservation,' '[a] complete biological assessment of the existing resources on the target areas,' '[s]pecific creation and restoration plans for each target area,' and "[p]erformance standards for success that will illustrate that the compensation ratios are met.'" (*Id*. at pp. 610-611.)

In upholding this measure, the court stated that the respondent city "did not defer a determination of whether the Project would have a significant impact on the vernal pool and seasonal wetland habitats or defer the identification of measures calculated to mitigate that impact. Rather, the City determined the impact the Project would have—habitat loss—and identified a specific measure to mitigate that impact—preservation or creation of replacement habitat off site in a specific ratio to the habitat lost as a result of the Project. While it is true the City did not identify any specific proposed mitigation site, there is nothing …. that required it to do so." (*Id*. at p. 622.)

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Although the measure in *California Native Plant Society* prohibited any net loss of acreage, the measure also addressed the "function and value of the impacted resources." (*Id*. at p. 610.) Options for mitigating the function and value of the impacted wetland habitat included "creation, restoration and preservation." (*Id*. at pp. 610-611.)

In *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794 (*Endangered Habitats League*), the court, using similar reasoning, upheld a mitigation measure addressed to the loss of habitat for the California gnatcatcher, a federally protected bird. The measure, the court said, "sets out the possibilities—on-site or off-site preservation of similar habitat at a ratio of at least two to one, or one of several possible habitat loss permits from relevant agencies. We believe this enumeration of alternative mitigation measures saves the provision from improper deferral." (*Ibid*.)

The same court also upheld a "mitigation measure for tree loss [that] requires a tree restoration, maintenance, and monitoring plan to be prepared and approved prior to issuing grading permits. It provides the plan must 'detail' long-term maintenance and monitoring, include requirements for replanting procedures, and include a contract with a certified arborist for at least 10 years. The arborist must make reports throughout the year and must be given decision-making power over tree care and maintenance. We find these standards sufficient." (*Id*. at p. 795.)

It is notable that, in *Endangered Habitats League*, the court upheld mitigation approaches that involved land preservation, tree replanting, maintenance, and monitoring as legitimate and complementary approaches to mitigation.

In *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 943, 946, the court upheld a mitigation measure addressing impacts to rare plants located on land identified for development. The measure allowed for "plant salvage and transportation plan to avoid, relocate or minimize impacts on these species." The governing performance standard required the successful establishment of at least 80 percent of transplanted plants. Notable here is the fact that the measure was sufficient though its performance standard stopped short of requiring "no net loss" of the adversely affected plants.

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In *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1038 (*ECOS*), the court was clear that adequate mitigation under CEQA, as well as under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), need not always require acre-for-acre mitigation. In that case, the court upheld under both CEQA and CESA a Habitat Conservation Plan approved not only under CESA but also under the federal Endangered Species Act (16 U.S.C. § 1531 et seq.). The Conservation Plan required the purchase of a half-acre for habitat reserves for every acre of new development. The court explained the overall workings of the Conservation Plan as follows:

> Under the plan, the Natomas Basin Conservancy (Conservancy), a nonprofit organization, will manage the habitat and monitor the health and welfare of the species, including the hawks and the snakes. The centerpiece of the plan is the purchase of one-half acre for habitat reserves for every acre that is developed, irrespective of the habitat quality of the land developed. The land acquisitions for reserves will be funded with mitigation fees paid by developers. The Conservancy will dedicate 50 percent of the 8,750 acres of reserve land to rice cultivation that serves as habitat for the snakes, 25 percent to managed marsh habitat for the snakes, and the remaining 25 percent in upland habitat for foraging opportunities for the hawks. *The Conservation Plan provides multiple justifications for the 0.5:1 ratio:* "(1) *the reserves will provide higher quality habitat than the lands to be developed, especially given that the reserves will be managed for the covered species; (2) much of the land to be developed is of limited value as habitat but will be assessed as if it were of value; (3) the reserves will provide permanent habitat for the covered species; (4) the [Conservation Plan] provides monitoring and adaptive management to protect the species; and (5) the reserves will be large and biologically viable*."
>
> (142 Cal.App.4th at p. 1025, italics added.)

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The referenced 0.5 to 1 mitigation ratio was intended not only to satisfy CEQA's mitigation requirements, but also to satisfy the CESA requirement that the impacts of any "take" of an endangered or threatened species be "minimized and fully mitigated" in a manner that is "roughly proportional in extent to the impact of the authorized taking on the species." (*Ibid*., quoting Fish & G.Code, § 2081, subd. (b)(2).)

As the lengthy quotation above makes clear, among the reasons why a ratio of half an acre to one acre was permissible under both CEQA and CESA were that "much of the land to be developed is of limited value as habitat" and that "the reserves will provide higher quality habitat than the lands to be developed."

The court rejected the petitioner's argument that a minimum one to one ratio was required by CEQA. The court explained that "[t]he Conservation Plan in fact mitigates for the impacts on covered species in a variety of ways beyond the purchase of a half acre

for every acre developed. The reserves purchased with the mitigation fees will be *maintained* as habitat in perpetuity. Moreover, the Conservancy is mandated by the Conservation Plan to *manage* rice farms, which might otherwise disappear from the Natomas Basin. The preconstruction surveys, preservation of land adjacent to Fisherman's Lake, avoidance of development in the one-mile hawk zone, and *planting of nest trees* are all part of the integrated mitigation plan designed to compensate for the incidental take of any covered plants and animals." (142 Cal.App.4th at p. 1039, italics added.) The court thus emphasized that the Conservation Plan would improve the biological conditions of the land to be preserved through an integrated approach that include active maintenance, management, and enhancement of the land.

The court made similar points in upholding the mitigation ratio against an attack under CESA:

> We have described at some length the impressive avoidance, minimization, and mitigation features of the Conservation Plan, including the purchase of reserve lands to be developed and maintained as high quality habitat, adaptive management, adjustments because of recovery plan adoption, and extensive compliance and biological effectiveness monitoring. The Department's findings that the entire Conservation Plan minimized and fully mitigated the impacts of the taking are further supported by the scientific assessment of the Natomas Basin in that several covered species do not occur in the basin or their use of the basin is low and sporadic, the basin constitutes an insignificant portion of most of the species' ranges, and habitat remains available within and outside the basin to satisfy species' essential behavioral needs.
>
> (*Id*. at p. 1043.)

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As the preceding detailed discussion of CEQA case law makes clear, there is abundant judicial authority for mitigation approaches that use tools such as conservation, enhancement, restoration, and recreation – separately or in combination – in order to achieve roughly proportional mitigation for lost or damaged biological resources. These are the very tools used in the Dana Reserve applicant's proposal to mitigate the effects of

the degraded Burton Mesa Chaparral habitat on the Project site. Where new or restored high-quality habitat will replace existing low-quality habitat, the proposal permissibly offers up smaller amounts of new or restored acreage to replace lost amounts of degraded acreage. The fact that the approach does not require "no net loss of acreage" does not make it legally or biologically infirm. The operative performance standard is "no net loss of habitat *quality*." This approach is not only biologically legitimate; but it also functions within the parameters of the constitutional principles described at length above.

We recognize that, as with any mitigation measure associated with a project approved under CEQA, our proposal will be subject to inclusion in a mitigation monitoring or reporting program (MMRP) pursuant to Public Resources Code section 21081.6, subdivision (a)(1), and CEQA Guidelines section 15097. To the extent that County staff has any concerns regarding the details for determining how to assess and ensure full compliance with our proposed approach, one possible useful exercise would be to map out, sooner rather than later, what a monitoring or reporting strategy for our proposed measure could look like. Though lead agencies need not include MMRPs in their Draft EIRs, there is certainly no prohibition against thinking ahead about how monitoring or reporting could work. Nor is there any prohibition against including monitoring or reporting provisions within the four corners of a proposed mitigation measure. [5]

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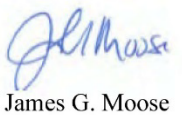
CONCLUSION

I am hopeful that this letter will assist San Luis Obispo County staff and its consultant team in understanding the reasoning behind the Dana Reserve applicant's proposed approach for mitigating for the loss of degraded onsite Burton Mesa Chaparral

[5] Our mitigation approach is also intended to achieve consistency with County General Plan Policy BR-2.6, which requires "require no net loss of sensitive natural plant communities and critical habitat areas."

habitat. This habitat was degraded as of the time the NOP was issued and will be degraded even more the next time the current agricultural lessee of the property takes steps, as have occurred since the 1930s, to facilitate the growing of grasses for cattle grazing. For all of the reasons laid out above, I believe that the proposed mitigation approach is sound and appropriate from a legal standpoint. The net result of Project approval will be the conservation, enhancement, restoration, and/or recreation of permanent habitat in lieu of currently degraded habitat in which the plants that contribute to Burton Mesa Chaparral habitat are periodically uprooted and killed. I would be happy to participate in any future meetings or oral discussions on this subject matter.

Sincerely,



James G. Moose

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(cont'd)

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Enclosures (Althouse Memorandum and PleinAire Mitigation graphics)

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Althouse Memorandum

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Memo

To: Jim Moose

From: LynneDee Althouse

Date: 3/23/2022

Copy: Nick Tomkins, Laurie Tamura

Re: Dana Reserve Maritime Chaparral Current Condition and Proposed Mitigation

Our recommended approach to reasonable and prudent mitigation for impacts to degraded maritime chaparral (aka Burton Mesa Chaparral) on the Dana Reserve is consistent with our 2021 Biological Report. This habitat has been periodically manipulated for farming and livestock range management since the 1930's (see historic aerials in Appendix F of our Biological Report).

1 SUMMARY OF IMPACTS

The Project proposes to impact 35 acres and preserve 0.9 acres of degraded Burton Mesa chaparral. The Alternative Project would impact 34.9 acres and preserve 1.1 acres of Burton Mesa chaparral.

Boundaries of the mapped Dana Reserve chaparral habitat circumscribe grazing land that contains occasional shrubs characteristic of Burton Mesa chaparral with scattered oaks (less than 20% oak cover) in habitat otherwise dominated by non-native grasses and herbs (see photos on page 3 of this memo). Rare manzanitas and ceanothus shrubs were very small (generally less than 3 feet in diameter, and less than 2 feet tall) during our site surveys. The project proposes to remove 460 rare chaparral shrubs (127 sand almond and 323 sand mesa manzanita) scattered within mapped maritime chaparral habitat that contains some of the constituent elements (plant taxa) characteristic of Burton Mesa Chaparral. In addition, approximately 6600 rare mesa horkelia plants would be removed. This perennial herb grows in patches along shady edges of oak woodland and among chaparral shrubs.

2 MITIGATION JUSTIFICATION

Below is a description from the Biological Report that describes characteristics of the Burton Mesa chaparral and site conditions observed during our biological surveys of the Dana Reserve. Note that characteristic chaparral plants had very low cover due to routine mowing/grubbing. Scattered oaks were present at less than 20 percent canopy cover.

2.1 Description of Typical Burton Mesa Chaparral

The National Vegetation Classification Hierarchy (USNVC by Jennings et al. 2009) may be used to classify constituent elements of chaparral on the Dana Reserve as part of the Californian

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maritime chaparral group. This group is within the formation subclass called Mediterranean scrub and grassland.

Burton Mesa chaparral (California Code 37.322.00) described in the CNPS Manual of California Vegetation Online (2022) lists two rare manzanitas, Purissima manzanita (*Arctostaphylos purissima*) and/or sand mesa manzanita (*Arctostaphylos rudis),* as the dominant or characteristically present manzanitas in the shrub canopy. Another manzanita, Eastwood's manzanita *(Arctostaphylos crustacea* ssp. *eastwoodiana*) is also a characteristic manzanita found in Santa Barbara County. Common shrub associates typically include chamise (*Adenostoma fasciculatum*), California sagebrush *(Artemisia californica*), coyote brush *(Baccharis pilularis*), buck brush *(Ceanothus cuneatus* var. *fascicularis*), bush monkeyflower (*Diplacus aurantiacus*), mock heather (*Ericameria ericoides*), golden yarrow (*Eriophyllum confertiflorum*), rush rose (*Helianthemum scoparium*), deer weed (*Lotus scoparius*) and black sage (*Salvia mellifera*). Rare varieties of the ceanothus species called *Ceanothus impressus* are also characteristic of this habitat. Emergent trees may be present at low cover, including coast live oak (*Quercus agrifolia*) or Shreve oak (*Quercus parvula* var. *shrevei*). Shrubs are generally less than 5 meters (16 feet) tall and their canopy open to continuous.

In the Burton Mesa chaparral, the herbaceous layer is variable and may include cryptogamic crust. Burton Mesa chaparral soils are derived from Pleistocene sand deposits, and occasionally marine siltstones overlain with a thin sand layer.

Burton Mesa chaparral, also known as *Arctostaphylos (purissima, rudis*) Shrubland Special Stands, is a Sensitive Natural Community listed by CDFW as G1/S1 and is considered a Special Stand by CNPS, which defines this habitat type by the characteristic presence of sand mesa manzanita (CDFW 2022, CNPS 2022).

2.2 Maritime Chaparral on the Dana Reserve

On Dana Reserve, representatives of the Burton Mesa chaparral habitat occurs primarily as re-sprouting shrubs with an open canopy that has been disturbed by routine brush removal (Photo 1). This habitat type shows substantial evidence of vegetation type conversion from chaparral to Mediterranean annual grassland with scattered oaks as described by Pratt 2022. Mechanical disturbances allow herb invasion and a concurrent decline in shrub cover. Over time, shrubland has been replaced by grassland savannah with scattered oaks. During our site investigations of the Dana Reserve, the sand mesa manzanita (*Arctostaphylos rudis*) occurs as scattered resprouting individuals, though never reaching more than 1-2% cover (Photo 2).

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Photo 1. Re-sprouting shrubs in the disturbed Burton Mesa chaparral habitat which receives routine brush clearing, view north. May 18, 2018.



Photo 2. Re-sprouting sand mesa manzanita. June 9, 2020.

Weedy grasses, such as ripgut brome (*Bromus diandrus*) and veldt grass (*Ehrharta calycina*) are the dominant vegetation. Crown-sprouting chamise (*Adenostoma fasciculatum*) and black sage (*Salvia mellifera*) co-occur as scattered individuals in the shrub layer along with deerweed (*Acmispon glaber [Lotus scoparius]*), sticky monkeyflower (*Mimulus [Diplacus] aurantiacus*), coffeeberry (*Frangula californica*), hollyleaf cherry (*Prunus ilicifolia*), and broom rush-rose (*Crocanthemum [Helieanthemum] scoparium*).

This habitat on the Dana Reserve includes special status species as scattered individuals of sand mesa manzanita, sand almond (*Prunus fasciculata* var. *punctata*), sand buckbrush (*Ceanothus cuneatus* var. *fascicularis*), mesa horkelia (*Horkelia cuneata* var. *puberula*), and California spineflower (*Mucronea californica*).

Coast live oak trees are commonly found within Burton Mesa chaparral, but canopy does not exceed 20 percent absolute cover. Many of the species described within Burton Mesa chaparral are also present in coast live oak woodland, as both habitats often intergrade. The primary distinction between these two habitats is the canopy cover of coast live oaks, which, when greater than 20 percent, is considered a woodland or forest.

2.3 Characteristic Plant Taxa

The Dana Reserve contains taxa characteristic of the Burton Mesa Chaparral as described in the Manual of California Vegetation (Table 1). The most iconic representative chaparral plant is the rare sand mesa manzanita. Two rare ceanothus taxa are present as scattered individuals.

TABLE 1. CHARACTERISTIC BURTON MESA CHAPARRAL TAXA PRESENT ON THE DANA RESERVE

Scientific Name	Common Name	Rarity Status
Acmispon glaber [*Lotus scoparius*]	Deer weed	--
Adenostoma fasciculatum	Chamise	--
Arctostaphylos rudis	Sand Mesa manzanita	CRPR 1B.2
Artemisia californica	California sagebrush	--
Baccharis pilularis	Coyote brush	--
Ceanothus cuneatus var. *fascicularis*	Sand buck brush	CRPR 4.2
Ceanothus impressus var. *nipomensis*	Nipomo mesa ceanothus	CRPR 1B.2
Diplacus aurantiacus [*Mimulus aurantiacus*]	Sticky monkeyflower	--
Ericameria ericoides	Mock heather	--
Quercus agrifolia var. *agrifolia*	Coast live oak	--
Salvia mellifera	Black sage	--

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Other characteristic plant taxa listed in the Manual of California Vegetation not represented on the Dana Reserve include two manzanitas found in Santa Barbara County, plus two species well distributed in California: golden yarrow, a sub-shrub, and Shreve oak tree (Table 2).

TABLE 2. CHARACTERISTIC BURTON MESA CHAPARRAL TAXA NOT FOUND ON THE DANA RESERVE

Scientific Name	Common Name	Rarity Status
Arctostaphylos crustacea ssp. *eastwoodiana*	Eastwood's brittle-leaf manzanita	CRPR 1B.1
Arctostaphylos purissima	La Purissima manzanita	CRPR 1B.1
Eriophyllum confertiflorum	Golden yarrow	--
Quercus parvula var. *shrevei*	Shreve oak	--

2.4 Photos from CNPS MCVII Online

Two photographs from California Native Plant Society's website for the Manual of California Vegetation[1] for Burton Mesa Chaparral are provided below for reference. Notice structure and density of shrub cover in these reference sites.



Photo 3. Burton Mesa chaparral shrubs are densely packed. Older shrub crowns have started to die back. Younger, vigorous understory shrubs are in the foreground.

[1] Available at: https://vegetation.cnps.org/alliance/130

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Althouse and Meade, Inc.



Photo 4. Dense manzanita shrub cover near the coast in Santa Barbara County.

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2.5 Burton Mesa Chaparral Mitigation Considerations and Biological Justification

This section describes compensatory mitigation appropriate for loss of remnant Burton Mesa chaparral habitat and associated rare taxa that occur on the Dana Reserve. The total canopy area occupied by the sensitive characteristic herbs and shrubs plus oak trees on the Burton Mesa Chaparral during our site investigation was less than an acre (~25,000 sf; 0.57 acre), or less than 2 percent of the mapped 35 acre scattered distribution of the plants (Table 3). Burton mesa chaparral habitat should be replaced off site and protected for its habitat functions and values.

Individual rare plant taxa should be mitigated at ratios consistent with their rarity. Taxa considered rare and threatened (California Rare Plant Rank [CRPR] 1B) should have a higher mitigation ratio than less rare taxa (CRPR 4). For plants ranked 1B by CNPS the mitigation ratio shall be 2:1 for individuals in suitable/occupied habitat for taxa ranked 1B. Restore and/or enhance protected habitat suitable for 14,000 mesa horkelia, 100 Nipomo Mesa ceanothus, and 626 sand mesa manzanita (page 114 of the September 2021 Biological Report BIO-7).

For the annual plant ranked as 4, California mucronea, mitigation is complicated by its association with disturbance and its annual abundance directly affected by annual weather patterns. Mitigation measure BIO-8 in the Biological Report suggests restoration and/or enhancement of 45 acres of conserved land suitable for the spineflower. This measure may not be reasonable due to the variable population dynamics of this annual plant. This plant may occupy openings in chaparral shrub canopy within protected habitat.

Perennial plants on List 4 can be avoided (Michael's rein orchid) or mitigated at a 1:1 ratio. Replacement plantings on or off-site should include at least two sand buck brush and 127 sand almond plants. Sand almond, another plant ranked 4, may be included in the Burton Mesa chaparral mitigation plan.

TABLE 3. IMPACTS TO SENSITIVE PLANT TAXA CHARACTERISTIC OF BURTON MESA CHAPARRAL ON THE DANA RESERVE

Sensitive Plant Species Impacted Alternative Plan	Rarity	Impact (approx. count)*	Impact degraded canopy (sf)	Percent of 35 Acres degraded habitat impacted
Herbs				
California spineflower [annual]	4.2	800,000**	variable	--
Mesa horkelia[2] [perennial]	1B.1	6608	5947	0.39%
Shrubs				
Nipomo mesa ceanothus	1B.2	8	56s	<0.01%
Sand almond[3]	4.3	127	897	0.06%
Sand buck brush	4.2	2	14	<0.01%
Sand mesa manzanita	1B.2	323	2280	0.15%
	Rare shrub totals		***3509***	**0.23%**
Trees				
Coast live oaks (canopy)	(not rare)	155	101,160	6.64%
	Total Rare Shrub, Oak Tree and Mesa Horkelia Canopy Cover		110,616 **(2.5 acres)**	**7.26%**

*Refer to Table 19 in Biological Report (Sept 2021)
**Count of individuals highly variable, depending on seasonal climate conditions. Individuals may occur in disturbed grassland or among chaparral shrubs in sandy soil.

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Common species such as coyote brush, monkeyflower, California sagebrush, and chamise also occupy less than two percent vegetative cover within the chaparral habitat boundary. Low native shrub cover is due to decades of mowing and grubbing for livestock range management.

The functions and values of the Burton Mesa chaparral on site is very low; shrub cover is not contiguous, and does not provide substantial cover for songbirds, mammals, reptiles or insects. Unique habitat functions not present on the Dana Reserve include sufficient flowers, fruits, and vegetation necessary to support a stable population of chaparral dwellers such as rabbits, mice, voles, songbirds, bees, butterflies, spiders, flies, lizards, horned lizards, and snakes.

Chaparral habitat, as opposed to individual plants, may be mitigated by conservation of intact habitat, enhancement of weedy or lightly damaged protected habitat, restoration of degraded habitat, or re-creation of high-quality habitat. Depending on the approach taken, a ratio of 1 to 1 or higher may not be biologically necessary, given the low function and values of existing habitat being mitigated.

[2] A large proportion of impacted Mesa horkelia occurs along the edge of oak woodlands, NOT in the chaparral habitat. They are all included here for illustrative purposes.

[3] Dune almond grows on sandy soil in and adjacent to maritime chaparral in San Luis Obispo County.

When ***conserving*** excellent but currently unprotected high-quality habitat as mitigation for the loss of degraded habitat, a 1.5 to 1 ratio will avoid loss of overall habitat quality because conservation with management for the benefit of unique habitat functions will offset the loss of highly degraded habitat. A ratio of more than 1:1 is needed because conservation does not produce new habitat, though it does provide legal protection for high-quality habitat against the possibility of future loss or degradation from lawful activities. The conserved habitat will also be managed to ensure that its high quality will be maintained.

When ***enhancing*** moderate to poor quality protected habitat as mitigation for the loss of degraded habitat, a 2 to 1 ratio will avoid loss of overall habitat quality because unique habitat functions that support chaparral dwellers is substantially improved by reducing invasive species cover, and/or reducing access that causes disturbance that otherwise diminishes chaparral habitat functions and values. The 2 to 1 ratio accounts for the fact that the habitat is already protected, though it is in poor to moderate condition.

When ***restoring*** damaged protected habitat as mitigation for the loss of degraded habitat, a 0.5 to 1 ratio will avoid any loss of overall habitat quality because weed removal in concert with replanting and routine maintenance for the benefit of habitat functions significantly improves habitat functions and values from a degraded or damaged condition. A ratio of less than 1 to 1 is sufficient because restoration of damaged protected habitat will substantially improve the condition of such habitat. An acre of restored habitat will have substantially more biological value than an acre of degraded habitat. A half-acre of restored habitat would function at least as well, if not better than an acre of degraded habitat.

When ***recreating*** high quality habitat on completely disturbed land such as abandoned farmland, a 0.25 to 1 ratio will avoid any loss of overall habitat quality because conversion from completely degraded conditions to a highly functioning habitat transforms the land from zero chaparral habitat value to high quality chaparral habitat. A ratio of less than 1 to 1 is sufficient because recreating high quality habitat where none currently exists will result in the creation of all new habitat where it had been eliminated. A quarter-acre of recreated habitat will have significantly more value than no habitat at all.

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In summary, rare plant taxa associated with the Burton Mesa chaparral habitat on the Dana Reserve should be mitigated by replacement at ratios consistent with their rarity. These taxa should be planted in habitat protected for its chaparral functions and values for wildlife. The degraded habitat lost may be mitigated by a variety of methods from conservation of intact habitat, enhancement or restoration of moderate to poor quality habitat, and/or recreation of high-quality habitat.

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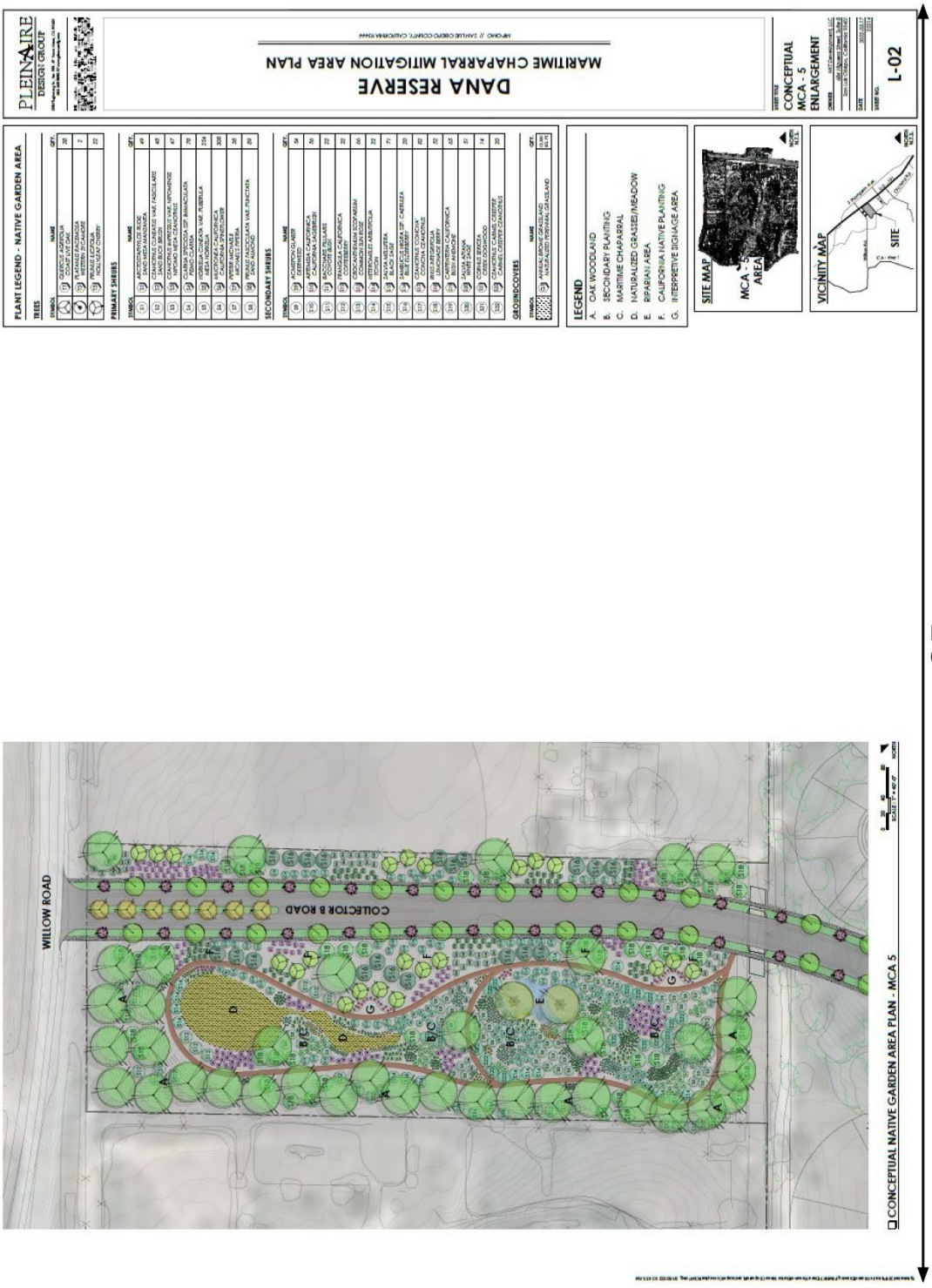
Pratt, R.B. 2022. Vegetation-type conversion of evergreen chaparral shrublands to savannahs dominated by exotic annual herbs: causes and consequences for ecosystem function. American Journal of Botany, 109(1), pp.9-28. Available online https://bsapubs.onlinelibrary.wiley.com/doi/10.1002/ajb2.1777

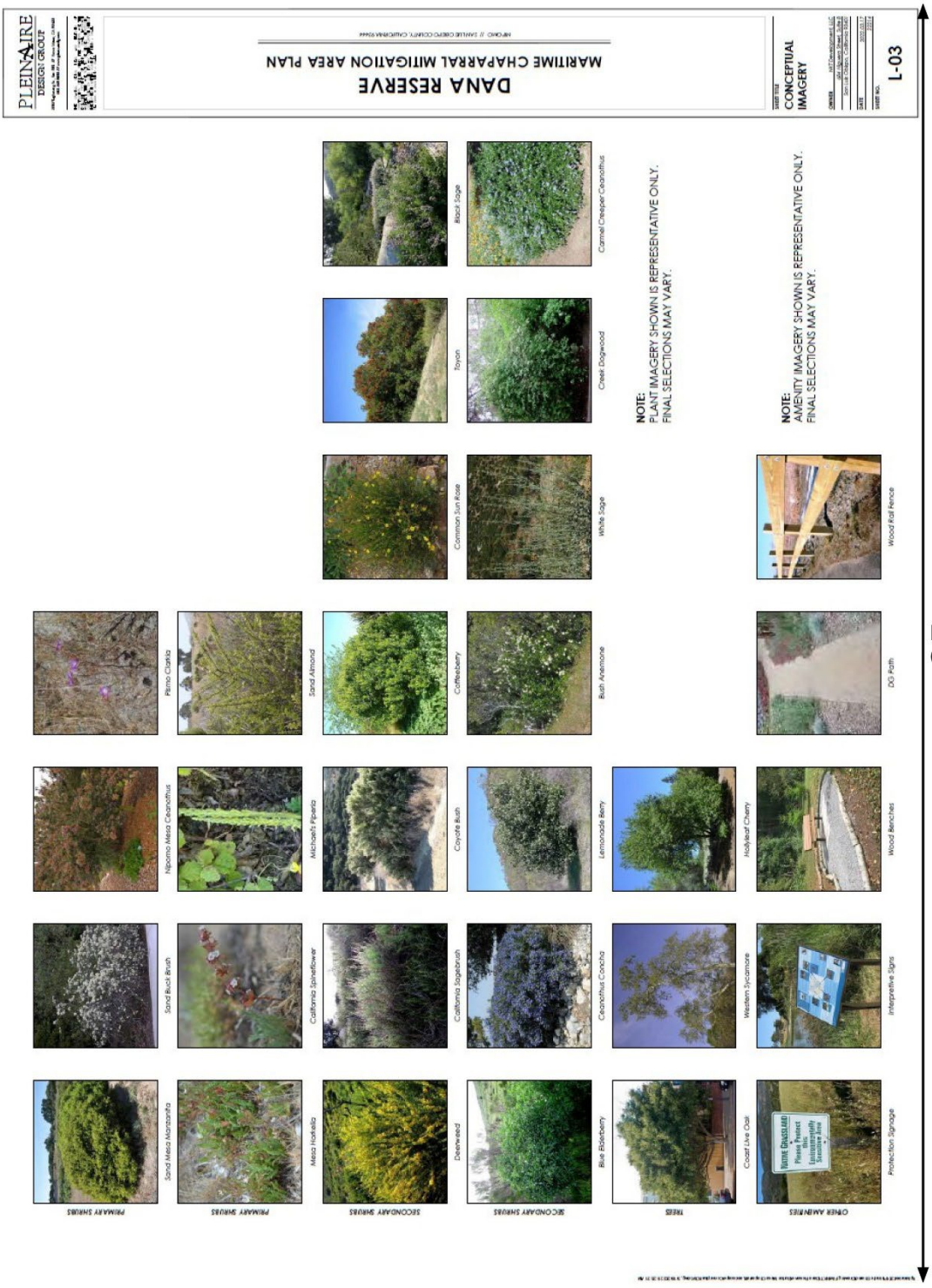
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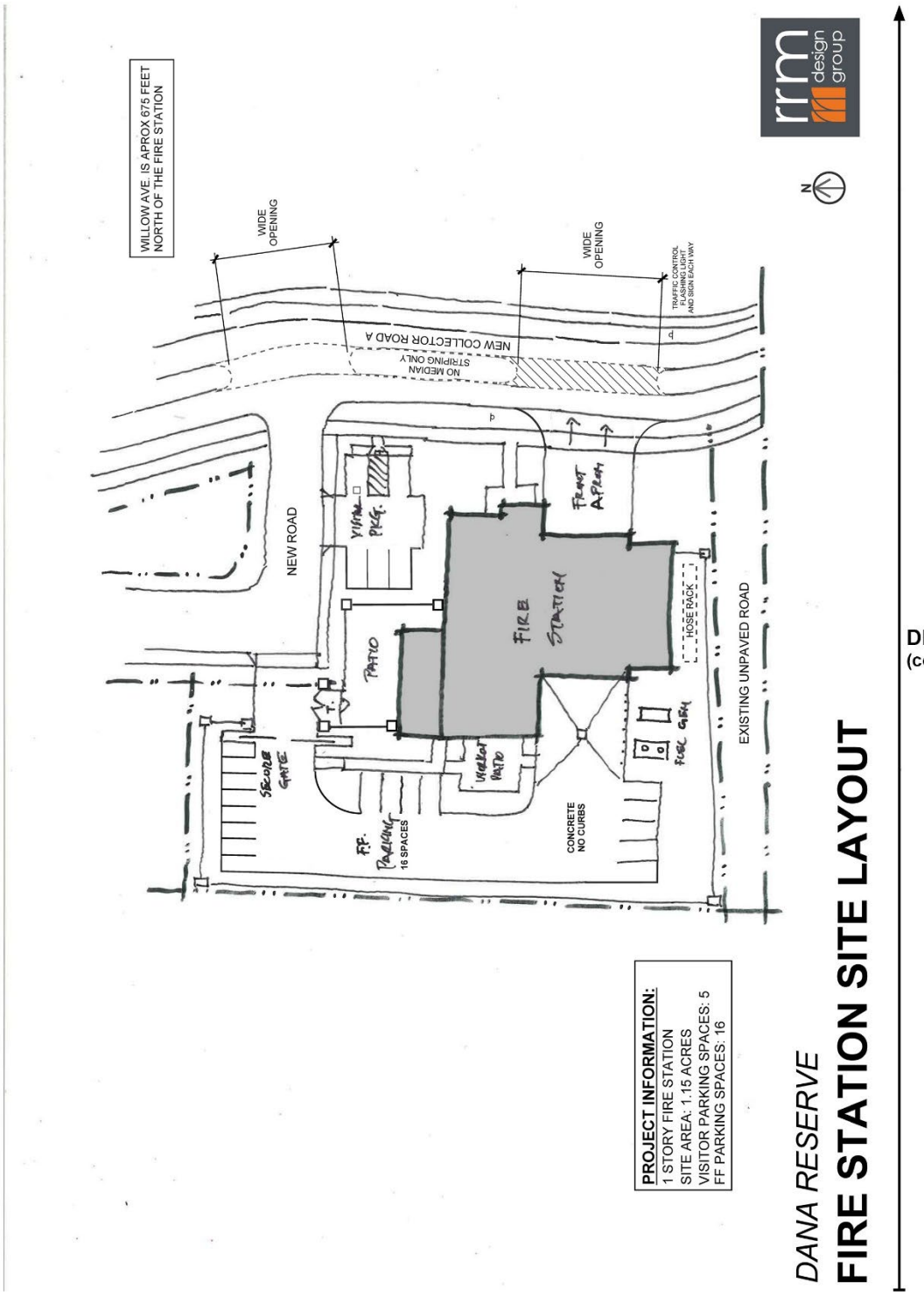
PleinAire Mitigation Graphics

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9.4.1.1 Response to Letter from Dana Reserve LLC (via RRM Design Group)

Comment No.	Response
DRL-1	The comment states the EIR analysis related to policy inconsistency does not apply the principles established by *No Oil, Inc. v. City of Los Angeles* (1987), *Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. Of Supervisors* (1998), and *Endangered Habitats League, Inc. v. County of Orange* (2005). It is noted that perfect conformity with every general plan policy is neither achievable nor required (*Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Board of Supervisors [1998] 62 Cal.App.4th 1332, 1341*-1342). The decision makers are required to evaluate the project's consistency with the General Plan as a whole and a project should only be found inconsistent with the General Plan as a whole when it conflicts with a general plan policy that is fundamental, mandatory, and clear. This background information has been added to Section 4.11, *Land Use and Planning*, of the EIR. Notwithstanding these requirements, CEQA Guidelines Section 15125(d) requires an EIR to "discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans." While CEQA requires a discussion of consistency with applicable plans and policies, inconsistency does not necessarily lead to a significant impact. Inconsistency with public plans or policies creates significant impacts under CEQA only when an adverse physical effect would result from the inconsistency. Ultimately, it is a function of the local decision-making body (San Luis Obispo County Board of Supervisors) to make a determination regarding the project's consistency with applicable plans as a whole. The detailed policy-specific analysis in the EIR is intended to facilitate that decision-making process. Therefore, the EIR preparers completed a detailed consistency analysis of the proposed project by analyzing each of the individual policies and goals applicable to the project, but only identified preliminary consistency findings (e.g., potentially consistent or potentially inconsistent).
DRL-2	The comment requests the Executive summary specify that Dana Ridge is 388 acres and that any necessary updates to impact headings and mitigation measures be verified and updated throughout the remainder of the EIR. Revisions have been incorporated in the Executive Summary to specify that the Dana Ridge site is 388 acres. All revisions to impact headings and mitigation measures have been carried through the Executive Summary, MMRP, and other relevant portions of the EIR.
DRL-3	Revisions have been incorporated Chapter 2, *Project Description*, of the EIR to clarify that commercial uses are also present south of the project site.
DRL-4	Figure 2-5 has been revised to show the Item 7 improvement within the footprint of the existing pump station facility.
DRL-5	The comment states Collector A will provide access and infrastructure connections as well as public facilities such as a park and ride and a potential fire stations and requests that this information be added to the Project Description. Revisions have been incorporated to add this information into the Project Description; however, a reference to the potential fire station was not included since it is not proposed as a project component (but rather, was a mitigation requirement).
DRL-6	The comment refers to Table 2-2, Section 2.5.3.11, and Table 2-5 and states that the density was revised for DR-SF2 to 11-13 du/ac per correspondence between the Applicant and the County on January 14, 2022. Revisions have been incorporated to revise this information in Table 2-2, Section 2.5.3.1.1, and Table 2-5.
DRL-7	The comment requested that a footnote be added to Table 2-4 stating that there will be a transit center, park and ride, and fire station in the RR parcel for Collector A. Footnote 4 has been revised to state a transit center and Park and Ride lot would be located within the RR land use designation; however, the fire station was not included in this revision since it is not proposed as a project component.
DRL-8	This comment requests that updated information from the 2020 Census be incorporated. Updated information from the 2020 Census has been incorporated.
DRL-9	Revisions have been incorporated for Table 2-9 to clarify that "Alternative Fueling Installations" such as hydrogen and EV charging stations would be a permitted use in Commercial land use categories.

Comment No.	Response
DRL-10	The comment states that Table 2-10 Rec and OS Development Standards from the Specific Plan is missing and should be added to Section 2.5.3.1.3. The information included in Table 2.10: Recreation and Open Space Development Standards in the Specific Plan. No further changes to the EIR are necessary.
DRL-11	The comment has provided an exhibit that illustrates the Cherokee Road improvements at the Collector A and B intersections. These improvements are described in Section 2.5.3.3.6 of the EIR, under Cherokee Place Intersections. These exhibits will be included in the Final EIR. No other changes to the EIR are necessary.
DRL-12	The comment states that the 2020 US Census and the population of Nipomo should be added to the Environmental Setting section. The EIR has been revised to include the 2020 US Census and population of Nipomo.
DRL-13	This comment states the property has a documented historic use of cattle grazing and periodic, seasonal dry farming for feed and requests that this information be included in every section that refers to the agricultural use of the property. This clarification has been incorporated in Chapter 3, *Environmental Setting*, Section 4.1, *Aesthetics*, and Section 4.2, *Agriculture and Forestry Resources*.
DRL-14	Chapter 3, *Environmental Setting*, has been revised to specify the acreage of Dana Ridge.
DRL-15	The comment states that the cumulative lists need a total for the build out and states the total build out of 300-unit housing units and ADUs and commercial square feet. Table 3-1 has been revised to include total buildout estimates.
DRL-16	See response to comment DRL-13.
DRL-17	The comment refers to the project's consistency with the existing visual character of the area. Table 4.1-1 has been revised to state that is planned for growth in the County's South County Area Plan.
DRL-18	This comment references Mitigation Measure AES/mm-3-1 and states the existing SoCalGas easement is 20 feet wide. The commenter states the Applicant agrees to an additional 30 feet for planting trees for a total of 50 feet for a landscaping buffer. Subsequent discussions have resulted in a reduction in the width of this buffer to 20 feet. The author of the Aesthetics section of the EIR, a landscape architect and visual resource specialist, has confirmed this change would still provide adequate mitigation to reduce potential impacts to less than significant. Mitigation Measure AES/mm-3.1 has been revised to incorporate this clarification.
DRL-19	The comment references Mitigation Measure AES/mm-3.2 and recommends revisions be included to specify container sizes for replacement trees. AES/mm-3.2 applies to all plantings throughout the Specific Plan Area, not just the U.S. Route 101 Visual Screening Zone. Therefore, no changes to AES/mm-3.2 have been made; the size requirements in AES/mm-3.2 will apply to half of all plantings on the project site. However, the more stringent container size requirements have been added to AES/mm-3.1 and would apply to any plantings within the U.S. Route 101 Visual Screening Zone. Mitigation Measure AES/mm-3.1 has been revised accordingly.
DRL-20	The comment refers to Mitigation Measure AES/mm-7.1 and states the EIR has already done the visual assessment and states the measure is redundant and should be deleted. The visual analysis has been completed at a programmatic level. Future analysis is needed to ensure future developments within the Specific Plan Area are appropriately designed to minimize noticeability from areas outside the Dana Reserve boundaries.
DRL-21	The comment refers to the policy consistency analysis related to Policy AQ 1.2 in Section 4.3, *Air Quality*, and states the project satisfies the intent of the policy through required mitigation. The EIR preparers agree; therefore, the policy consistency analysis has been revised to indicate that the project is potentially consistent with Policy AQ 1.2.
DRL-22	The comment refers to the policy consistency analysis related to Infill 8 in Section 4.3, *Air Quality*, and states the project should be considered consistent with this policy. The EIR preparers agree; therefore, the policy consistency analysis has been revised to indicate that the project is potentially consistent with Policy Infill 8 of the Sustainable Communities Strategy. This potential consistency determination was identified in Section 4-11, Land Use and Planning; therefore, this discrepancy in the Draft EIR has been remedied.

Comment No.	Response
DRL-23	This comment refers to the policy consistency analysis related to Policies 11-24 in Section 4.3, *Air Quality*, and states that discussion should be added indicating that the property is planned for development in the SCAP and is in the Nipomo SOI and adjacent to the current service line. This clarification has been made in the policy consistency analysis.
DRL-24	This comment refers to the policy consistency analysis related to Land Use Planning Strategy L-3 and states that the analysis of Land Use Planning Strategy L-3 should be revised to reflect a regional perspective. The EIR identified a significant and unavoidable impacts related to unplanned growth, VMT, and an adverse contribution to the existing jobs and housing imbalance. No changes to the EIR are necessary in response to this comment.
DRL-25	This comment requests removal of AQ/mm-3.3(7) and AQ/mm-3.3(19). These measures are necessary to reduce potential impacts to the greatest extent feasible. AQ/mm-3.3(7) specifies that the Park and Ride lot proposed as part of the project could meet the requirements of this measure. Public Assembly and Entertainment Facilities are an allowed use in the Commercial designation. If no event centers are ultimately proposed, this measure would not be applicable. No changes to the EIR are necessary in response to this comment.
DRL-26	This comment requests that a discussion of *Deinandra paniculata* be included in Section 4.4, *Biological Resources*. A discussion of *Deinandra paniculate* has been added to Table 4.4-3 in Section 4.4, Biological Resources of the EIR.
DRL-27	This comment refers to Table 4.4-6 in Section 4.4, *Biological Resources*, and states the policy analysis should reflect that the site is planned for development in the South County Area Plan. Table 4.4-6 has been revised to reflect that the site is planned for development in the South County Area Plan; however, preliminary policy determinations have not changed.
DRL-28	This comment refers to Table 4.4-6 in Section 4.4, *Biological Resources*, and states that the policy consistency analysis related to Goal BR-1, Policy BR-1.4, Goal BR-3, and Policies BR-3.1 and BR-3.2 should include reference to the oaks to be retained/replanted onsite and preserved at Dana Ridge. The policy consistency analysis has been revised to reference oak trees and oak woodland habitat that would be retained at the Dana Ridge property.
DRL-29	The comment refers to the policy consistency analysis related to Policy BR 1.2 and states it should be deleted because it does not apply to the project. While it is agreed that the site has not been identified as “essential” habitat, the EIR contains substantial evidence supporting a potential inconsistency with this policy. No changes to the EIR are necessary.
DRL-30	The comment refers to the policy consistency analysis related to Policies BR 1.4, BR 1.9, BR 2.6, BR 3.3, OS 1.1, OS 2.1, and Policy Objective 6.4 and requests revisions be incorporated to refer to the Applicant-proposed 4.27-acre native garden. Reference to the Applicant-proposed 4.27-acre native garden has been included in Table 4.4-6.
DRL-31	The comment refers to the policy consistency analysis related to Goal BR 2 and requests revisions to the policy analysis. The policy consistency analysis has been revised to reflect Applicant-proposed measures to protect Pismo Clarkia.
DRL-32	The comment refers to the policy consistency analysis related to Policies BR 2.1 and BR 2.2 and requests revisions to the policy analysis. The policy analysis has been revised to clarify permitting requirements.
DRL-33	The comment refers to the policy consistency analysis related to Policies BR 3.5, BR 4.1, BR 4.2, BR 4.7, BR 5.1, BR 5.2, and Policy 3 and requests the language be revised to state “Applicant and/or NCSD will conduct a wetland delineation…” This revision is applicable to and has been incorporated for Policies BR 4.1, BR 4.2, BR 5.2, and Policy 3.
DRL-34	The comment refers to Mitigation Measure BIO/mm-5.1 and requests revisions be incorporated. The revisions do not affect the effectiveness of the measure. Mitigation Measure BIO/mm-5.1 has been revised in all applicable sections of the EIR.
DRL-35	The comment refers to Mitigation Measure BIO/mm-6.1 and requests revisions be incorporated. Bullet 4 is appropriate, as the County and CDFW should be apprised of the relocation activities. Biologist qualifications have been clarified in Bullet 7.
DRL-36	The comment refers to Mitigation Measure BIO/mm-8.1 and requests revisions be incorporated. Mitigation Measure BIO/mm-8.1 has been revised in all applicable sections of the EIR.

Comment No.	Response
DRL-37	The comment refers to Mitigation Measure BIO/mm-9.1 and requests revisions be incorporated. The revisions do not affect the effectiveness of the measure. Mitigation Measure BIO/mm-9.1 has been revised in all applicable sections of the EIR.
DRL-38	The comment refers to Mitigation Measure BIO/mm-10 and requests revisions be incorporated. Mitigation Measure BIO/mm-10 has been revised in all applicable sections of the EIR.
DRL-39	The comment refers to Mitigation Measure BIO/mm-11 and requests revisions be incorporated. Mitigation Measure BIO/mm-11 has been revised in all applicable sections of the EIR.
DRL-40	The comment refers to Mitigation Measure BIO/mm-12.1 and requests revisions be incorporated. Mitigation Measure BIO/mm-12.1 has been revised to include a reference to Nipomo Creek.
DRL-41	This comment refers to Mitigation Measure BIO/mm-19.1 and requests revisions be incorporated. Mitigation Measure BIO/mm-19.1 has been revised in all applicable sections of the EIR.
DRL-42	This comment refers to Mitigation Measure CLR/mm-3.1 and requests the language be revised to include “or utility district/company”. Mitigation Measure CR/mm-3.1 has been revised accordingly.
DRL-43	The comment refers to the policy consistency analysis related to Principal 1, Policy 5 and requests language be added to note that PG&E also needs to have a green portfolio for electricity generation and can serve this project as well as 3CE. This revision has been incorporated for the policy consistency analysis related to Principal 1, Policy 5 in Section 4.6, *Energy*.
DRL-44	The comment requests “11-acre public park” be revised to clarify a 10-acre park and 1-acre equestrian staging area are proposed. This revision has been incorporated in Section 4.6, *Energy*, Section 4.15, *Public Services*, Section 4.16, *Recreation*, and Section 4.19, *Utilities and Service Systems*.
DRL-45	The commenter refers to the impact discussion in Section 4.7, *Geology and Soils,* which discusses the low paleontological potential for the site and requests that Mitigation Measures GEO/mm 8.1, GEO/mm 8.2, and GEO/mm-8.3 be deleted or revised to state “if discovery during grading is found…” As described under Impact GEO 8, higher sensitivity formations (Qoa) are located in close proximity to the project site, and it is possible that deposits also underlie the Specific Plan Area. Therefore, based on required compliance with existing regulations, ground-disturbing activities could uncover paleontological resources in previously undisturbed geologic deposits, and, if improperly handled, such resources could be damaged or destroyed, a potentially significant impact. Therefore, mitigation has been identified requiring compliance with COSE Policy CR 4.5 to ensure potential impacts would be less than significant. No changes to the EIR are necessary.
DRL-46	The comment requests revisions be incorporated in Section 4.8, *Greenhouse Gas Emissions*, to state the 1990 level of GHG emissions. The 1990 level of GHG emissions has been incorporated into Section 4.8, *Greenhouse Gas Emissions.*
DRL-47	The comment states that the Dana Reserve incorporates all of the RTP/SCS standards and states this should be noted in Section 4.8, *Greenhouse Gas Emissions*. Section 4.8.2.3.1, *San Luis Obispo Council of Governments 2019 Regional Transportation Plan And Sustainable Communities Strategy*, includes a general description of the 2019 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), not a project-specific consistency analysis. A discussion of the project’s consistency with the RTP is included in Table 4.8-3, *Consistency Analysis for Greenhouse Gas Emissions*, of Section 4.8, *Greenhouse Gas Emissions*.
DRL-48	The comment refers to policy consistency analysis related to Policy AQ 1.2 and states it should clearly state that the VMT only exceeds the threshold by 4.8% and 9% and that these are minor exceedances. This revision has been incorporated in Table 4.8-3, *Consistency Analysis for Greenhouse Gas Emissions*, of Section 4.8, *Greenhouse Gas Emissions*.
DRL-49	This comment refers to the policy consistency analysis related to policies E1.1, E3.1, E3.2, E4.1, E4.4, E5.4 and clarifies that the nonresidential uses would still be served by natural gas. This revision, consistent with other changes to Mitigation Measure GHG/mm-1.1, has been incorporated in Table 4.8-3, *Consistency Analysis for Greenhouse Gas Emissions*, of Section 4.8, *Greenhouse Gas Emissions*.

Comment No.	Response
DRL-50	This comment requests revisions to the policy consistency analysis contained in Table 4.8-3 in Section 4.8, *Greenhouse Gas Emissions*. The policy consistency analysis has been revised to indicate that the project is potentially consistent with Policy Infill 8 of the Sustainable Communities Strategy.
DRL-51	This comment refers to Mitigation Measure GHG/mm-1.1(8) and clarifies that high reflective roofing material should only be installed on flat roofs. This measure has been revised to clarify that visual impacts of reflective roofing shall be a consideration in where the use of them is practical. This commenter also identifies two additional measures related to requirements for photovoltaic systems and EV stations that should be added to Mitigation Measure GHG/1.1. References to state requirements have been added to this measure. This revision has been incorporated in Mitigation Measure GHG/mm-1.1(8) in Section 4.8, *Greenhouse Gas Emissions*.
DRL-52	The comment refers to the opening sentence of Section 4.10, *Hydrology and Water Quality*, and states that the word adverse should be removed. The intent of CEQA is to identify and disclose potential adverse effects on the environment. No changes to the EIR are necessary.
DRL-53	The comment refers to Section 4.10.1.2, *Specific Plan Area Conditions*, of Section 4.10, *Hydrology and Water Quality*, and states that the Assessor's Parcel Number (APN) of the northern parcel should be included. This revision has been incorporated in Section 4.10, *Hydrology and Water Quality*.
DRL-54	The comment refers to Section 4.10.1.4.2, *Groundwater*, of Section 4.10, *Hydrology and Water Quality*, and states that "municipal mix" is also referred to as "blended" water. This clarification has been added.
DRL-55	This comment states that the language in the EIR should be revised to eliminate the phrase "service area" when referring to annexation to the NCSD. Annexation into the NCSD's service area is an accurate statement. No changes to the EIR are required.
DRL-56	This comment suggests revisions to the discussion of groundwater recharge Under HYD Impact 3. This revision has been incorporated Section 4.10, *Hydrology and Water Quality*.
DRL-57	This comment refers to Section 4.11.2.3.2, *2019 Regional Transportation Plan/Sustainable Community Strategy*, in Section 4.11, *Land Use and Planning*, and states that the DRSP has incorporated features to make it consistent with the RTP/SCS. The analysis included in Land Use and Planning, includes a general description of the 2019 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), not a project-specific consistency analysis. A discussion of the project's consistency with the RTP is included in Table 4.11-3. No revisions are necessary.
DRL-58	This comment requests revisions to the policy consistency analysis related to policy AQ 1.1. The policy consistency analysis states that the project is potentially consistent with Policy AQ 1.1; minor modifications, consistent with other sections, have been added.
DRL-59	This comment refers to the policy consistency analysis related to policy Infill 8 and states that the project is consistent with this policy. The policy consistency analysis states that the project is potentially consistent with Policy Infill 8; however, the project's location near the Nipomo URL has been clarified.
DRL-60	This comment requests revisions to the evaluation of LUP Impact 3. The evaluation of LUP Impact 3 has been revised to clarify that the project would further divide the jobs-to-housing ratio in the community of Nipomo, which is a jobs and housing imbalance.
DRL-61	This comment refers to the goals and policies consistency analysis in Table 4.11-4 (Policies for which the Project would be Potentially Inconsistent With) of Section 4.11, *Land Use and Planning*, and states that any policy consistency analyses that are updated elsewhere should be reflected in this section. Relevant policy consistency analyses have been updated in Table 4.11-4.
DRL-62	This comment suggests revisions to LUP Impact 8 in Section 4.11, *Land Use and Planning.* The EIR has been revised to remove the reference to maintenance of the bus stop on North Thompson Avenue from LUP-8 in Section 4.11, *Land Use and Planning.*
DRL-63	This comment requests revisions to LUP Impact 8 in Section 4.11, *Land Use and Planning*. The evaluation has been updated to clarify that the project includes a request to adjust the Nipomo URL and Annexation to the NCSD.

Comment No.	Response
DRL-64	This comment requests clarification be made regarding the placement of commercial buildings along the freeway to Compatibility of *Proposed Land Uses with Traffic Noise Levels* under N Impact 1 in Section 4.13, *Noise*. This revision has been incorporated into Section 4.13, *Noise*. No discussion of alternatives is provided in this section.
DRL-65	This comment requests revisions to Mitigation Measure N/mm-1.2(1). It cannot be reasonably determined if the commercial buildings would serve as an adequate noise barrier to internal residential uses until acoustical assessments are completed based on project specific details such as building height, orientation, mass, and spacing. No changes to the EIR are necessary.
DRL-66	This comment requests revisions to Mitigation Measure N/mm-1.2(2). It cannot be reasonably determined if the placement of the listed equipment on the east side of the buildings would adequately reduce noise impacts until acoustical assessments are completed based on project specific details. No changes to the EIR are necessary.
DRL-67	This comment refers to Section 4.14.1.1.1, *County of San Luis Obispo*, of Section 4.14, *Population and Housing*, and states that the word "decrease" should be changed to "increase." This commenter also states that the EIR should correctly state that 273 new jobs would be created by the proposed project. The word decrease is correctly used in Section 4.14.1.1.1, *County of San Luis Obispo*, of Section 4.14, *Population and Housing;* therefore, no changes to the EIR are necessary. However, the EIR has been updated to correctly state that 273 jobs would be created by the proposed project.
DRL-68	This comment requests that paragraphs 3 and 4 on page 4.14-15 of Section 4.14, *Population and Housing*, are updated to state that the Growth Management Ordinance will not apply to the DRSP because it is a stand-alone planning document. This is not a CEQA issue; no changes to the EIR are necessary.
DRL-69	This comment requests that the reference to Table 4.14-12 is changed to 4.14-13. This revision has been incorporated in Section 4.14, *Population and Housing*.
DRL-70	This comment requests revisions to the policy consistency analysis for Principle 2, Policy 2 of Section 4.14, *Population and Housing.* The determination of the policy consistency analysis for Principle 2, Policy 2 of Section 4.14, *Population and Housing*, is supported by evidence in this section. No changes to the EIR are necessary.
DRL-71	This comment refers to PH Impact 1 of Section 4.14, *Population and Housing*, and states that the 2030 population numbers are not consistent with those included in Section 4.16, *Recreation,* and should be revised. The evaluation of Section 4.15, *Public Services* and Section 4.16, *Recreation* is based on the total buildout population of the DRSP area resulting from 831 new residential single-family units, 458 new residential multi-family units, an estimated 152 ADUs, and approximately 203,000 square feet of land dedicated to flex commercial development. These sections accurately reflect the total buildout population of the proposed project and projected 2030 population for the county and the community of Nipomo; therefore, no revisions to the EIR are necessary.
DRL-72	This comment requests revisions to PH Impact 1 of Section 4.14, *Population and Housing*. This discussion has been revised to clarify that the project is in response to the SCAP and addresses a range of needed housing in the area.
DRL-73	This comment requests revisions to PH Impact 5 of Section 4.14, *Population and Housing*. This discussion has been revised to clearly state that the project would contribute to state and local housing goals and would be consistent with the need for a Specific Plan in the County's South County Area Plan; however, PH Impact 5 would remain a Class I impact because potential impacts associated with substantial unplanned population growth are cumulative by nature, in that they are evaluated within the greater context of the region rather than impacts on the Specific Plan Area or local community of Nipomo.
DRL-74	This comment states that Section 4.15, *Public Services*, should rely on the final numbers of the 2020 Census numbers. The background information presented in Section 4.15.1.4.2, *Existing Regional Parkland Level of Severity*, provides a description of the existing recommended levels of severity for park facilities as determined in the County's 2016 to 2018 Resource Summary Report. As such, these determinations are based on final Census numbers from 2010 and the evaluation of the project's impacts on park facilities is based on current and future population numbers. Therefore, no revisions to the EIR are necessary.
DRL-75	This comment requests revisions to the policy consistency analysis related to Policy 2.2, Public Facilities #1, and Public Facilities #2,3. The determination of the policy consistency analysis is supported by evidence in this section. No changes to the EIR are necessary.

Comment No.	Response
DRL-76	This comment requests revisions to the policy consistency analysis related to Principal 1, Policy 2 and Strategy 4. The determination of the policy consistency analysis is supported by evidence in this section. No changes to the EIR are necessary.
DRL-77	This comment requests revisions to PS Impact 1 of Section 4.15, *Public Services.* This discussion has been revised to reflect that CAL FIRE has requested that a fire station be located on-site, and funds be allocated toward this new station.
DRL-78	This comment notes that future development of the fire station will be the responsibility of the County. No changes to the EIR are necessary.
DRL-79	This commenter suggests that this section should include a conceptual figure of the future fire station for reference (see attachment). The conceptual plan is included in the Final EIR and a reference has been added to this section. No additional changes to the EIR are necessary.
DRL-80	This comment requests revisions to Table 4.15-5 and Table 4.15-9. These tables have been revised to rectify the population estimates for the community of Nipomo included in Table 4.15-5 and Table 4.15-9.
DRL-81	This comment is noted; however, no changes to the EIR are necessary.
DRL-82	This comment requests revisions to the policy consistency analysis of Policy 2.2-7, Objective B, Policy 6.4, Policy 6.9, Policy 6.10, and the South County Area Plan in Section 4.16, *Recreation*. The determination of the policy consistency analysis is supported by evidence in this section. No changes to the EIR are necessary.
DRL-83	This comment requests removal of Policy 4.2 from Table 4.16-3 of Section 4.16, *Recreation.* This policy has been removed from Table 4.16-3.
DRL-84	This comment refers to Section 4.17, *Transportation*, and states that “tis” should be revised to TIS. This revision has been incorporated in Section 4.17, *Transportation*.
DRL-85	This comment refers to Figure 4.17-1 of Section 4.17, *Transportation,* and states that Camino Caballo is not shown on this map and states that Hetrick Avenue all the way to Pomeroy and Cory Ways should be shown as emergency access. Figure 4.17-1 identifies Camino Caballo. This figure is intended to show the intersections that were studied as part of the Transportation Impact Study. Therefore, no revisions to the EIR are necessary.
DRL-86	This comment requests revisions to Section 4.17.1.1, *Roadway Network*, of Section 4.17, *Transportation.* This discussion has been updated to clarify the right-of-way associated with Cherokee Place and to include a description of Cory Way.
DRL-87	This comment requests revisions to Section 4.17.2.3.4, *2015 South County Circulation Study and Traffic Impact Fee Update Final Report*, of Section 4.17, *Transportation.* The EIR is based on the traffic report prepared for the project; no changes to the EIR are necessary.
DRL-88	This comment refers to the policy consistency analysis related to Policy AQ 1.2 in Table 4.17-1 (Preliminary Policy Consistency Evaluation) and states that Mitigation Measure TR/mm-3.1 should be referenced rather than TR/mm-2. This revision has been incorporated in Section 4.17, *Transportation*.
DRL-89	This comment refers to the policy consistency analysis related to Policy 7 in Table 4.17-1 (Preliminary Policy Consistency Evaluation) and states that Mitigation Measure TR/mm-3.1 should be referenced rather than TR/mm-2. This revision has been incorporated in Section 4.17, *Transportation*.
DRL-90	This comment refers to the policy consistency analysis related to Policy 9 in Table 4.17-1 (Preliminary Policy Consistency Evaluation) and states that the language of the determination should be revised to reflect the project’s provision of two transit centers with dedicated land and infrastructure. This revision has been incorporated in Section 4.17, *Transportation*.
DRL-91	This comment refers to the policy consistency analysis related to Policy 2 in Table 4.17-1 (Preliminary Policy Consistency Evaluation) and states that Mitigation Measure TR/mm-3.1 should be referenced rather than TR/mm-2. This revision has been incorporated in Section 4.17, *Transportation*.

Comment No.	Response
DRL-92	This comment requests revisions to the policy consistency analysis related to Circulation Objective a and Goal #3 in Table 4.17-1 (Preliminary Policy Consistency Evaluation). The policy consistency analyses have been updated to reference Mitigation Measure TR/mm-3.1 rather than TR/mm-2 and to clarify that implementation of TDM measures are for the whole project rather than individual neighborhoods.
DRL-93	This comment refers to the policy consistency analysis related to Circulation Objective d, Public Transit #2, Park and Ride #1, and Policy Objective 1.2 in Table 4.17-1 (Preliminary Policy Consistency Evaluation)and states that Mitigation Measure TR/mm-3.1 should be referenced rather than TR/mm-2. This revision has been incorporated in Section 4.17, *Transportation*.
DRL-94	This comment requests revisions to Section 4.17.4, *Impact Assessment and Methodology*, of Section 4.17, *Transportation*. These discussions have been revised to clarify the design of the new access driveways.
DRL-95	This comment requests revisions to TR Impact 1 of Section 4.17, *Transportation.* Refer to response to comment DRL-87.
DRL-96	This comment requests revisions to TR Impact 1 of Section 4.17, *Transportation.* This discussion has been revised to remove reference to the provision of a Class II bike trail on Thompson Ave.
DRL-97	This comment requests revisions to TR Impact 1 of Section 4.17, *Transportation.* This discussion has been revised to remove reference to the maintenance of the off-site bus stop.
DRL-98	This comment refers to TR Impact 3 of Section 4.17,*Transportation* and states that reference to the new transit route on Frontage road should be made. The discussion included in TR Impact 3 of Section 4.17, *Transportation,* evaluates the project's ability to be screened out as having less-than-significant impacts on VMT using the County's SB 743 Sketch VMT tool based on existing project conditions; therefore, reference to the proposed TDM measures related to provision of transit facilities is not necessary. The discussion of the project's TDM measure, which includes the provision of transit within the project area is discussed further in TR Impact 3.
DRL-99	This comment requests revisions to TR/mm-3.1 and clarifies that TDM will be done for the whole project not individual neighborhoods. This will be determined as appropriate by the County Public Works Department. This measure has been revised accordingly.
DRL-100	This comment refers to TR Impact 7 of Section 4.17, *Transportation* and states that there is no mention of the future fire station on Collector A. This revision has been incorporated in Section 4.17, *Transportation.*
DRL-101	This comment refers to *Groundwater* under Section 4.19.1.1.2, *Water Supply*, and states that the word basin should be replaced with the phrase management area. This revision has been incorporated in Section 4.19, *Utilities and Service Systems*.
DRL-102	This comment refers to *Groundwater* under Section 4.19.1.1.2, *Water Supply*, and suggests removing the word "basin" when referring to the NMMA management area. This revision has been incorporated in Section 4.19, *Utilities and Service Systems.* Response needed
DRL-103	This comment refers to *Groundwater* under Section 4.19.1.1.2, *Water Supply*, and states that the NCSD groundwater supply should be rewritten to state that the average groundwater supply was determined based on average pumping volumes over a 5-year period. This revision has been incorporated in Section 4.19, *Utilities and Service Systems*.
DRL-104	This comment refers to *Purchased or Imported Water* under Section 4.19.1.1.2, *Water Supply*, and suggests a replacement sentence for the opening sentence of the last paragraph. This revision has been incorporated in Section 4.19, *Utilities and Service Systems*.
DRL-105	This comment refers to USS Impact 3 and states that the evaluation incorrectly states that there may not be enough water for the project. US1 Impact 3 concludes that the NCSD is projected to have sufficient water supply to serve the existing service area, the proposed project, and reasonably foreseeable future demands during normal, single dry, and multiple dry year conditions. Due to the uncertainty of buildout, Mitigation Measure USS/mm-3.1 has been conservatively included to ensure the availability of water for the existing NCSD service are and proposed project. Therefore, no revisions to the EIR are necessary.
DRL-106	This comment refers to USS Impact 3 and states that the public park should be referenced as the 10-acre public park and 1-acre equestrian staging area. This revision has been incorporated in Section 4.19, *Utilities and Service Systems*.

Comment No.	Response
DRL-107	This comment refers to Tables 4.19-19 and 4.19-21 and states that they should be revised to reflect the construction of 1,289 residential units. Tables 4.19-19 and 4.19-20 do not indicate the number of housing units; no changes to the EIR are necessary. Please refer to Appendix H.
DRL-108	This comment states that Mitigation Measure USS/mm-3.1 should be removed. US1 Impact 3 concludes that the NCSD is projected to have sufficient water supply to serve the existing service area, the proposed project, and reasonably foreseeable future demands during normal, single dry, and multiple dry year conditions. Due to the uncertainty of buildout, Mitigation Measure USS/mm-3.1 has been conservatively included to ensure the availability of water for the existing NCSD service are and proposed project. Therefore, no revisions to the EIR are necessary.
DRL-109	This comment states that reference to additional service letters for each project should be removed from USS Impact 11. Due to the uncertainty of buildout, Mitigation Measure USS/mm-3.1 has been conservatively included to ensure the availability of water for the existing NCSD service are and proposed project. This mitigation would require future DRSP developers to provide proof of water availability sufficient to meet the estimated water demand of proposed development. Therefore, no revisions to the EIR are necessary.
DRL-110	This comment refers to WF Impact 3 and states that reference to “fire water storage” should be removed because the project would be served by the NCSD. This information is consistent with the Resolute Associates report prepared for the project; no changes to the EIR are necessary.
DRL-111	This comment refers to Section 5.4.1.1.19, *Utilities and Service Systems*, under the No Project Alternative and states that the No Project Alternative should identify an increase in traffic along Tefft Street due to other development. This revision has been incorporated in Section 5, *Alternatives Analysis*.
DRL-112	This comment refers to Section 5.4.1.1.17, *Transportation and Traffic*, under the No Project Alternative and states that the No Project Alternative should state that residents within the NCSD service area would be subject to higher costs for water for infrastructure improvements and the cost of contracted water. This revision has been incorporated in Section 5, *Alternatives Analysis*.
DRL-113	This comment refers to Section 5.4.2.1 Specific Plan Area under Alternative 1 and states that Collector B would connect Pomeroy to Willow Road. This revision has been incorporated in Section 5, *Alternatives Analysis*.
DRL-114	This comment requests revisions to *Specific Plan Area* under Section 5.4.2.3.1, *Aesthetics*, under Alternative 1. This discussion has been revised to indicate that the DRSP is the guiding document for this area and to clarify that visual impacts would be limited to those along US 101.
DRL-115	This comment requests revisions to Section 5.4.3.1, *Specific Plan Area*, under Alternative 2. This discussion has been revised to clearly state that Alternative 2 would not provide land donated for the day center, affordable housing, Cuesta College, transit station, and fire station should be added. The evaluation of Alternative 2 has also been revised to clarify potential VMT impacts.
DRL-116	This comment requests revisions to *Specific Plan Area* under Section 5.4.3.2.10, *Hydrology and Water Quality*, under Alternative 2 related to higher costs for water for infrastructure improvements and the cost of contracted water. A discussion of higher costs for water is not required because this section is related to hydrology rather than water supply. No revisions to the EIR are necessary.
DRL-117	This comment requests revisions to Section 5.4.3.2.11, *Specific Plan Area*, under Alternative 2. This discussion has been revised to clearly state that Alternative 2 would not provide land donated for the day center, affordable housing, Cuesta College, transit station, and fire station should be added.
DRL-118	This commenter states that Section 5.4.4.3, *Analysis of Alternative 3*, under Alternative 3 should be updated to indicate negative environmental justice impacts under this alternative. The Analysis of Alternative 3 states that Alternative 3 would not meet the basic project objective of providing affordable workforce market rate homes. Therefore, no revisions to the EIR are necessary.
DRL-119	This commenter refers to *Specific Plan Area* under Section 5.4.4.3.4, *Biological Resources*, under Alternative 3 and states that it was incorrectly assumed that this alternative would reduce impacts to biological resources. Clustered development could be sited and designed to avoid impacts to sensitive biological resources; however, this discussion has been revised to clarify that Alternative 3 would not provide dedicated open space to preserve sensitive biological resources. Based on the reduction of the disturbance area on the project site, it was determined that impacts to biological resources would be reduced under this alternative. Mitigation would continue to be required to require compensatory replanting, which would avoid individual landowners from removing additional resources from the project site. Therefore, no additional revisions are necessary.

Comment No.	Response
DRL-120	This commenter refers to the GHG analysis under Alternative 3 and states that per capita VMT would likely increase. The GHG Analysis for Alternative 3 concludes that VMT generated by the project would continue to have the potential to exceed regional thresholds. This alternative would be required to implement mitigation to further reduce VMT to ensure consistency with applicable goals, plans, and policies related to GHG-reduction strategies. However, since Alternative 3 would result in less population growth and associated operational VMT in comparison to the proposed project, with implementation of mitigation to further reduce operational VMT, this alternative would be expected to be consistent with applicable goals, plans, and policies related to GHG-reduction strategies. Therefore, impacts would be decreased in comparison to the proposed project, and no revisions are necessary.
DRL-121	This commenter refers to Alternative 3 and states that it should not be the environmentally superior alternative because it has greater inconsistencies with applicable land use plans. The analysis provides substantial evidence to support the EIR's conclusion that Alternative 3 is the Environmentally Superior Alternative. No changes to the EIR are necessary.
DRL-122	This commenter states that paragraph 3 on page 5-52 should be revised to state the uncertainty of the maintenance of the proposed trail amenities. This revision has been incorporated in Section 5, *Alternatives Analysis*.
DRL-123	This commenter refers to Specific Plan Area under Section 5.4.4.3.16, *Recreation*, under Alternative 3 and states that clarification should be made regarding maintenance of trails, type of proposed residential dwellings, and VMT impacts. The discussion of potential recreational impacts has been revised to clarify that the maintenance of trails would be unknown. The VMT Analysis for Alternative 3 concludes that VMT generated by the project would continue to have the potential to exceed regional thresholds. This alternative would be required to implement mitigation to further reduce VMT to ensure consistency with applicable goals, plans, and policies related to VMT-reduction strategies. However, since Alternative 3 would result in less population growth and associated operational VMT in comparison to the proposed project, with implementation of mitigation to further reduce operational VMT, this alternative would be expected to be consistent with applicable goals, plans, and policies related to VMT-reduction strategies. Therefore, impacts would be decreased in comparison to the proposed project, and no additional revisions are necessary.
DRL-124	This commenter states that *Specific Plan Area* under Section 5.4.4.3.19, *Utilities and Service Systems*, under Alternative 3 should include a calculation for water use under Alternative 3. A rough estimate of water demand for Alternative 3 has been included in paragraph 1 on page 5-54 of Chapter 5, *Alternative Analysis*.
DRL-125	This commenter states that Alternative 4 should clarify that approximately 15 acres of land would be used private roads. This revision has been incorporated in Section 5, *Alternatives Analysis*.
DRL-126	This commenter states that Section 5.5, *Environmentally Superior Alternative*, should be updated to state that Alternative 3 should not be the environmentally superior alternative. Alternative 2 (La Cañada Ranch Specific Plan) and Alternative 3 (Residential Rural Cluster Subdivision) would both reduce the project's significant environmental impacts related to GHG emissions, land use and planning, and population and housing. In addition, Alternative 2 (La Cañada Ranch) would further reduce impacts to air quality and transportation, but would increase potential impacts to recreation. Alternative 3 (Residential Rural Cluster Subdivision) would further reduce impacts to biological resources and public services compared to the proposed project, but would potentially increase impacts to utilities and service systems if annexation into the NCSD service area was not feasible. Because Alternative 3 would be residentially focused, Alternative 3 would meet more of the project's basic objectives than Alternative 2. Therefore, the EIR determined that Alternative 3 would be considered the environmentally superior alternative because it would reduce the project's significant impacts and more successfully meet the basic project objectives. Minor revisions have been addressed.
DRL-127	This commenter states that the conclusion of the Alternative Analysis should be updated as Alternative 3 would increase impacts and would be more inconsistent with the DRSP. As discussed under DRL-126, the EIR determined that Alternative 3 would be considered the environmentally superior alternative because it would reduce the project's significant impacts and more successfully meet the basic project objectives. Therefore, no revisions are necessary.

Comment No.	Response
DRL-128	This commenter states that Section 6.1.3, *Establishment of a Precedent-Setting Action*, under Chapter 6, *Other CEQA Considerations*, should include Pomeroy as an additional access point and asks for clarification as to why the project would result in a precedent setting action. This revision has been made in Chapter 6, Other CEQA Considerations. As described in Section 6.1.3, the project would include establishment of new land use designations within the Specific Plan Area to allow for increased density of development as well as allow for the development of commercial uses, such as a hotel and educational facilities. Establishment of new higher-density residential development, recreational amenities, education facilities, and commercial uses within the Specific Plan Area may increase the attractiveness of surrounding rural residential land for future residential development at similarly higher densities, including construction of ADUs and/or subdivisions and future commercial development. Development of high-density uses within the Specific Plan Area would also influence the baseline for future development density and visual character of surrounding areas, which may make the demand for future higher-density development in the project vicinity increase, compared to existing conditions. No revisions related to a precedent setting action is necessary.
DRL-129	This commenter refers to Section 6.1.4, *Development or Encroachment into an Isolated Area*, under Chapter 6, *Other CEQA Considerations*, states that this should not be a Class 1 impact and that the project is consistent with the SCAP, RHNA, and many other policies. Although the Class 1 determination comes at the end of Section 6.1, it relates to the discussion under 6.1.3. This has been clarified in the EIR. This is a conservative determination consistent with the determination of PH Impact 1.
DRL-130	This comment includes exhibits provided for reference and a photocopy of a letter evaluating the adequacy of the proposed mitigation for the Burton Mesa Chaparral habitat. No revisions to the EIR are necessary.

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9.5 PUBLIC COMMENT LETTERS AND RESPONSES

The following members of the public have submitted comments on the Draft EIR.

Table 9.5-1. Public Comments

Respondent	Code	Contact Information	Page
Denise Barilla Letter dated: 06/18/2022	DBa	goodpasta2@gmail.com	9.5-9
Alison Martinez Letter dated: 06/20/2022	AM	ajaymum@charter.net	9.5-12
Jose Martinez Letter dated: 06/20/2022	JM	infantry1sgt@gmail.com	9.5-13
Jeff Edwards Letter dated: 06/22/2022	JEd	jhedwardscompany@gmail.com	9.5-15
Gregg Reimers, PE Letter dated: 06/25/2022	GRe	556 Charro Way Nipomo, CA 93444 greim416@gmail.com	9.5-17
Judd King Letter dated: 07/10/2022	JK	Atascadero jkingesp@gmail.com	9.5-26
Sue Shaleen Letter dated: 07/12/2022	SSh(1)	suequilting@gmail.com	9.5-31
Alexander Glotov Letter dated: 07/13/2022	AG	750 Sandydale Dr Nipomo, CA 93444 1344 N Martel Ave, #302 Los Angeles, CA 90046 alexxvita@gmail.com	9.5-33
Stacy Letter dated: 07/13/2022	St	katherineanddogs@gmail.com	9.5-45
BC Prewett Letter dated: 07/14/2022	BCP	bcprewett@gmail.com	9.5-47
Beth Ralston Letter dated: 07/14/2022	BR	mesagirl@verizon.net	9.5-49
Danna Weidner Letter dated: 07/14/2022	DMW	1551 Cielo Lane Nipomo, California 93444	9.5-53
Dan Doberstein Letter dated: 07/16/2022	DaDo	dandober@yahoo.com	9.5-55
Deanna Talerico Letter dated: 07/16/2022	DT	scdeannad@hotmail.com	9.5-57
Pam Howard Letter dated: 07/19/2022	PH	210 Brunos Ct. Nipomo, CA 93444	9.5-59
Lawrence E. Cools Letter dated: 07/20/2022	LEC	2coolsaints@att.net	9.5-62
Margaret Cools Letter dated: 07/20/2022	MC	2coolsaints@att.net	9.5-64
Matt Kobliska Letter dated: 07/20/2022	MK	855 Ten Oaks Way Nipomo, CA 93444	9.5-66

Respondent	Code	Contact Information	Page
Chris Santala Letter dated: 07/20/2022i	CSa	chris.santala@gmail.com	9.5-68
Elizabeth Scroggs Letter dated: 07/21/2022	ES	b-scroggs@msn.com	9.5-70
Nancy Damron Letter dated: 07/22/2022	NDa	nancylee1313@yahoo.com	9.5-72
Cheryl Eastman Letter dated: 07/22/2022	CE	tuppercheryl@gmail.com	9.5-74
Rachael Hazen Letter dated: 07/22/2022	RH	1347 Black Sage Circle Nipomo, CA 93444	9.5-76
Samantha Myers Letter dated: 07/22/2022	SM	spoblitz@gmail.com	9.5-78
Gail Roberts Letter dated: 07/22/2022	Gro	gatroberts@gmail.com	9.5-80
Deah Rudd Letter dated: 07/22/2022	DRu	deahrudd@att.net	9.5-82
Julie Tacker Letter dated: 07/22/2022	JuT	P.O. Box 6604 Los Osos, CA 93412	9.5-84
Mike Watson Letter dated: 07/22/2022	MW	mikewatson827@yahoo.com	9.5-87
Milly Bruno Letter dated: 07/23/2022	MB	1020 La Serenata Way Nipomo, CA 93444 jomibru@att.net	9.5-89
Susan Nanas Calvert Letter dated: 07/23/2022	SNC	snanascpa@aol.com	9.5-91
Christine Freytag Letter dated: 07/24/2022	CF	519 Charro Nipomo, CA 93444 christine.freytag@caci.com	9.5-93
Kelly Kephart Letter dated: 07/24/2022	KK	mountainviolet@gmail.com	9.5-95
Toni Destro Letter dated: 07/25/2022	TD	tdestro@earthlink.net	9.5-103
Nicole Duran Letter dated: 07/25/2022	NDu	4nduran@gmail.com	9.5-105
Jeff Ellis Letter dated: 07/25/2022	JEl	536 Pomeroy Road Nipomo CA 93444 katie.e@sbcglobal.net	9.5-107
Kathryn Ellis Letter dated: 07/25/2022	KE	536 Pomeroy Road Nipomo CA 93444 katie.e@sbcglobal.net	9.5-111
Joyce Hartwig Letter dated: 07/25/22	JoH	hartwighome@att.net	9.5-115
Melissa and Jack Peterson Letter dated: 07/25/2022	MJP	850 Sandydale Drive Nipomo CA 93444 mlssap@live.com K6dmm@live.com	9.5-118

Respondent	Code	Contact Information	Page
Sue Shaleen Letter dated: 07/25/2022	SSh(2)	suequilting@gmail.com	9.5-120
Betty Sleeth Letter dated: 07/25/2022	BSl	bettysleeth@me.com	9.5-122
Greg and Pamela Sturgeon Letter dated: 07/25/2022	GPS	blue-skies@charter.net	9.5-125
Kathryn Aurand and Nathan Schleifer Letter dated: 07/26/2022	KANS	eddie@tolife.email	9.5-128
Diane Dolden Letter dated: 07/26/2022	DiDo	dianedolden@gmail.com	9.5-130
Elaine Von Achen Letter dated: 07/26/2022	EVA	elainevonachen@hotmail.com	9.5-132
J Ahler Letter dated: 07/27/2022	JA	jlmahler1947@gmail.com	9.5-134
David Biklen Letter dated: 07/27/2022	DBi	davidbiklen@yahoo.com	9.5-136
Susan Duran Letter dated: 07/27/2022	SD	943 Division Nipomo, CA 93444 togfrog@aol.com	9.5-138
Darcia Foose Letter dated: 07/27/2022	DaF	76darcia@gmail.com	9.5-140
Richard Foose Letter dated: 07/27/2022	RF	coolpainterdad@gmail.com	9.5-142
Sandy Garcia Letter dated: 07/27/2022	SG	718 January St Nipomo, CA 93444 sgarcia.skg@gmail.com	9.5-144
B.K. Richard Letter dated: 07/27/2022	BKR	(contact information not provided)	9.5-146
Carol Scalisi Letter dated: 07/27/2022	CSc	scalisi.carol@gmail.com	9.5-152
Linda Shelby Letter dated: 07/27/2022	LSh	1782 Trilogy Nipomo, CA 93444 lshelby805@gmail.com	9.5-154
Flora Arguilla, MBA Letter dated: 07/28/2022	FA	abiarguilla@me.com	9.5-156
Sharon Ashworth Letter dated: 07/28/2022	SA	leklein@aol.com	9.5-158
Wanda Cook Letter dated: 07/28/2022	WC	1994 Northwood Road Nipomo, CA 93444 wjcook12@hotmail.com	9.5-160
Jim and Peggy Cox Letter dated: 07/28/2022	JPC	720 Black Oak Lane Nipomo, CA 93444 jimpeg65@att.net	9.5-162
Nancy Ellison Letter dated: 07/28/2022	NE	gardenrose@nwlink.com	9.5-166

Respondent	Code	Contact Information	Page
Lori Manosar Letter dated: 07/28/2022	LM	828 Inga Road Nipomo, CA 93444 lmanosar@yahoo.com	9.5-169
George and Lori Mendez Letter dated: 07/28/2022	GLM	515 Tejas Place Nipomo, CA 93444 mendezlv@aol.com	9.5-171
Andrea Wagner Letter dated: 07/28/2022	AW	andreacarvel@yahoo.com	9.5-173
Steve Yamaichi Letter dated: 07/28/2022	SY	yamafam@att.net	9.5-175
Denver Foose Letter dated: 07/29/2022	DenvF	denverfoose@gmail.com	9.5-178
Erica Foose Letter dated: 07/29/2022	EF	ericadubois@yahoo.com	9.5-180
Jason Hart Letter dated: 07/29/2022	JaH	170 West Grand Avenue, Suite 203 Grover Beach, CA 93433 jason@hartcre.com	9.5-182
Brock Lyster Letter dated: 07/29/2022	BL	612 Sandydale Drive Nipomo, CA 93444 brocklyster@mac.com	9.5-184
Marci Lyster Letter dated: 07/29/2022	ML	612 Sandydale Drive Nipomo, CA 93444 marcilyster@mac.com	9.5-186
Sylvi Lyster Letter dated: 07/29/2022	SL	612 Sandydale Drive Nipomo, CA 93444 sylvilyster@mac.com	9.5-188
Chris and Leslie Mehigan Letter dated: 07/29/2022	CLM	880 Chata Street Nipomo, CA 93444 lesliehorton3@hotmail.com	9.5-190
Maureen Murphy Letter dated: 07/29/2022	MMu	momurphy22@gmail.com	9.5-192
Short Letter dated: 07/29/2022	S(1)	536 Charro Way Nipomo, CA 93444	9.5-194
Short Letter dated: 07/29/2022	S(2)	536 Charro Way Nipomo, CA 93444	9.5-196
Lisa Swiontek Letter dated: 07/29/2022	LSw	1445 Grand Avenue, Suite H Grover Beach, CA 93433 team@mojotermite.com	9.5-198
Jim Taber Letter dated: 07/29/2022	JiT	james.michael.taber@gmail.com	9.5-201
Rebecca Williams Letter dated: 07/29/2022	RW	534 Briarwood Lane Nipomo CA 93444 dogslaw@gmail.com	9.5-203
Linda Clarke Letter dated: 07/30/2022	LC	825 inga Road Nipomo, CA 93444	9.5-206
Heidi Ellis Letter dated: 07/30/2022	HE	team-e@pacbell.net	9.5-208

Respondent	Code	Contact Information	Page
Dena Foose Letter dated: 07/29/2022	DenaF	denafoose@yahoo.com	9.5-210
Eric Greening Letter dated: 07/30/2022	EG	dancinngsilverowl@gmail.com	9.5-213
Kitt and Nora Jenae Letter dated: 07/30/2022	KNJ	Nipomo, CA hoofmessages@gmail.com	9.5-216
Mark Mesesan Letter dated: 07/30/2022	MMe	873 Via Seco Nipomo, CA 93444 markmesesan@hotmail.com	9.5-218
David Paschke Letter dated: 07/30/2022	DP	twinsfan528@gmail.com	9.5-220
David Richards Letter dated: 07/30/2022	DRi	449 N Thompson Avenue Nipomo, CA 93444 drwa6aiw@gmail.com	9.5-222
Holly Sletteland Letter dated: 07/30/2022	HS	4849 See Ranch Lane Templeton, CA 93465	9.5-224
Stephanie Statom Letter dated: 07/30/2022	SSt	stephaniestatom@yahoo.com	9.5-229
Jessica Wallace Letter dated: 07/30/2022	JW	ladyseamyst@gmail.com	9.5-232
Laura Ahler Letter dated: 07/31/2022	LRA	jahler93@gmail.com	9.5-235
Dave and Sandy Christiansen Letter dated: 07/31/2022	DSC	Ten Oaks Way, Nipomo mrschristiansen2012@gmail.com	9.5-237
Jamie Cortez Letter dated: 07/31/2022	JC	jc40p@yahoo.com	9.5-241
Cherie Fitz-Gerald Letter dated: 07/31/2022	CFG	380 Rim Rock Road Nipomo, CA 93444 cherfts@outlook.com	9.5-243
Jose Gomez Letter dated: 07/31/2022	JG	jose_gomez_93444@yahoo.com	9.5-246
Brian and Brenda Hascall Letter dated: 07/31/2022	BBH	North Tejas Place, Nipomo bhascall@yahoo.com	9.5-248
Neil Havlik Letter dated: 07/31/2022	NHa	672 Serrano Drive, #11 San Luis Obispo, CA 93405	9.5-250
Nick Hernandez Letter dated: 07/31/2022	NHe	nickthequick805@outlook.com	9.5-255
Ryan Jones Letter dated: 07/31/2022	RJ	rjones93444@outlook.com	9.5-257
Herb Kandel Letter dated: 07/31/2022	HK(1)	776 Inga Road Nipomo, CA 93444 herbkandel@gmail.com	9.5-259
Ken Marschall Letter dated: 07/31/2022	KM	marschallken@gmail.com	9.5-263

Respondent	Code	Contact Information	Page
Cheryl McGuirk Letter dated: 07/31/2022	CMG	camcguirk@icloud.com	9.5-267
Dan and Alyssa Peterson Letter dated: 07/31/2022	DAP	781 Ridge Road Nipomo, CA 93444	9.5-269
Julie Pinozzotto Letter dated: 07/31/2022	JP	780 Amber Way Nipomo, CA 93444 pinozzottoj@yahoo.com	9.5-272
Natalie Rozier Letter dated: 07/31/2022	NR	natalierozier@gmail.com	9.5-274
Maria Sanchez Letter dated: 07/31/2022	MS	m_sanchez_805_ca@outlook.com	9.5-277
Debra Sauerbier Letter dated: 07/31/2022	DSa	670 Del Sol Street Arroyo Grande, CA 93420 surfblue@charter.net	9.5-279
Brian Sawyer Letter dated: 07/31/2022	BSa	622 Cherokee Place Nipomo, CA 93444 sawyer.brian@gmail.com	9.5-281
Chris Smith Letter dated: 07/31/2022	CSm	nipomobro@outlook.com	9.5-284
Tom Smith Letter dated: 07/31/2022	TS	tscp2000b@yahoo.com	9.5-286
Dan Stocks Letter dated: 07/31/2022	DaSt	danstocks@charter.net	9.5-288
Debbra Stoner Letter dated: 07/31/2022	DeSt	dstoner@apaleagues.com	9.5-291
Brian Thompson Letter dated: 07/31/2022	BT	calpoly1_1997@outlook.com	9.5-293
Mary Van Ryn Letter dated: 07/31/2022	MVR	maryvanryn@yahoo.com	9.5-295
Cynthia Bodger Letter dated: 08/01/2022	CB	theabodger@gmail.com	9.5-297
Kevin Buchanan, Lead Organizer SLO County YIMBY Letter dated: 08/01/2022	YIMBY	kevaustinbuch@gmail.com	9.5-301
Cheryl Carlsen Letter dated: 08/01/2022	CC	714 Glenhaven Place cheryl92708@yahoo.com	9.5-304
Kenneth Dalebout Letter dated: 08/01/2022	KD	kenneth.dalebout@dignityhealth.org	9.5-306
Ruth Danielson Letter dated: 08/01/2022	RD	rdanielson@msmarketintel.com	9.5-309
Diana Daugherty Letter dated: 08/01/2022	DDa	djd46@msn.com	9.5-310
Joshua Erdman Letter dated: 08/01/2022	JEr	josh@gettorchlight.com	9.5-312

Respondent	Code	Contact Information	Page
Lou Anne and Clyde George Letter dated: 08/01/2022	LACG	490 Lantana Street Nipomo, CA 93444 l.lockwood@sbcglobal.net	9.5-314
Lila Henry Letter dated: 08/01/2022	LH	henrylila42@yahoo.com	9.5-316
Dolores Howard Letter dated: 08/01/2022	DH	lefortsorganiccrops@gmail.com	9.5-319
Herb Kandel Letter dated: 08/01/2022	HK(2)	776 Inga Road Nipomo, CA 93444 herbkandel@gmail.com	9.5-324
Nathan Schleifer Letter dated: 08/01/2022	NS	nathan@tolife.email	9.5-327
Eva Ulz Letter dated: 08/01/2022	EUl	1124 Nipomo Street, Suite C San Luis Obispo, CA 93401	9.5-330
Eric Urbain Letter dated: 08/01/2022	EUr	ericu35120@gmail.com	9.5-338
Valerie Vaz Letter dated: 08/01/2022	VV	valvaz100@gmail.com	9.5-341
Kimberley and Darrell Victor Letter dated: 08/01/2022	KDV	665 Sequoia Lane Nipomo, CA 93444 victors2000@att.net	9.5-343
Paula Browne Letter dated: 08/01/2022	PB	765 Glenhaven Place Nipomo CA 93444	9.5-345
Alfred Holzheu, President **California Fresh Market** Letter dated: [undated]	CFM	2886 Mission Drive Solvang CA 93463 555 Five Cities Drive Pismo Beach CA 93449 771 E Foothill Blvd San Luis Obispo, CA 93405	9.5-347
John Joyce Letter dated: [undated]	JJ	jbjoyce@yahoo.com	9.5-349
Timothy O'Brien Letter dated: [undated]	TOB	510 Briarwood Lane Nipomo, CA 93444 myuzuu@gmail.com	9.5-358
Dustin and Jennifer Rhoades Letter dated: [undated]	DJR	532 Briarwood Lane Nipomo, CA 93444	9.5-361
Maria Diets-Stover Letter dated: [undated]	MDS	556 Riviera Circle Nipomo, CA 93444	9.5-364
Dan Woodson Letter dated: [undated]	DW	(contact information not provided)	9.5-366
Eric Lykens Letter dated: 08/03/2023	EL	886 Hetrick Avenue Nipomo, CA 93444	9-369

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9.5.1 Denise Barilla

[EXT]Dana Reserve Plan

D B <goodpasta2@gmail.com>
Sat 6/18/2022 7:39 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer,

As a Nipomo resident, I am wondering what accommodations will be made in order to absorb the additional access/egress with regard to the Dana Reserve plan? **DBa-1**

Thank you,

Denise Barilla

9.5.1.1 Response to Letter from Denise Barilla

Comment No.	Response
DBa-1	This comment raises concern regarding vehicle ingress and egress. Refer to JK-6, JK-7, and DMW-1, which addresses comments related to traffic congestion, hazards, and proposed roadway improvements.

9.5.2 Alison Martinez

[EXT]RE: Dana Reserve Draft Environmental Impact Report - comments

Alison Martinez <ajaymum@charter.net>
Mon 6/20/2022 1:10 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To whom it may concern

I am writing with some comments regarding the Dana Reserve draft EIR just received via email. I live in the adjacent neighborhood on Glenhaven very close to Hetrick Road bordering the Dana Reserve project. Firstly, I would like to say that this project will significantly impact the local neighborhood not only with traffic increase through the neighborhood but with lighting and noise and will not blend into the current rural area. **AM-1**

The roads in our neighborhood are currently used as a short cut by traffic from Pomeroy to Willow rather than traffic staying on Pomeroy to the traffic signal and then onto Willow. Our street and is already impacted by trucks and school buses in violation of the weight restriction and other traffic. All traffic also ignores the stop sign at the intersection of Ten Oaks and Glenhaven and many traffic collisions have occurred there, and several vehicles have crashed into fences and ended up in yards during the night. Hetrick is only 20 ft. wide and posted 15 mph as there is a severe hairpin turn at the corner of Hetrick and Glenhaven place. In REC impact 2 of the draft, it states that there will be no increased use of the existing neighborhood however I disagree as it is estimated over 400-600 resident will be trying to exit the project each day, most onto Willow, controlled by only a stop sign, and then onward to access the freeway. This will inevitably cause backups through the project and housing so people will start using or continue using alternative existing route through our neighborhood. I believe the 20 ft wide Hetrick road with a very unsafe hairpin turn at Hetrick Road and Glenhaven should be closed to through traffic this would avoid the traffic increase in our neighborhood and allow residents to safely access the proposed amenities available in the project. Currently there are no sidewalks or bike lanes on Hetrick, Glenhaven or Ten Oaks (which was supposed to be added as stated in the traffic circulation long term goals for Hetrick) **AM-2**

I noted on the draft it states the lighting from the project will not significantly impact the existing area, not sure how that can be the case when building and lighting over 1200 homes and creating 2 lighted collector roads when currently there is no street lighting in the surrounding area or roads **AM-3**

Also, on the report is stated the aim is for the project to blend with the neighborhood however all the surrounding residence are on at least 1 acre lots, but the largest Dana Reserve lot is 7800 sq ft which is 8 houses per acre with the rest on smaller lots so this will no way blends into the area. There appears to be a better Alternative plan 5 in the EIR to creating a gradual transition along the fringe areas **AM-4**

I read on the EIR (AES impact 3) that there would be a visual screen put in place shielding the homes on the east side of the project from the 101 freeway. I do believe a visual screen, possible leaving the existing oaks and grassland in place, should be established between the current neighborhood on Hetrick and this large residential project **AM-5**

WF impact 8 of the draft states there would be no risk of flooding however currently after a rain the water travel downhill adjacent to the project on Hetrick like a river and onto Glenhaven and even cuts through our yard causing significant flooding. We have call SLO county on this issue but are unwilling to change the grading or add drainage in the roadway **AM-6**

These above comments are just a few items that I noted from the draft but do know that many elderly neighbors agree with the issues stated above and are not in favor of the project but do not have the ability to use email. Last April, we as a neighborhood submitted a petition signed by over 30 neighbors who are against the project and asking for Hetrick to be closed to minimized traffic. This was sent to Public Works department and to the Board of Supervisors. I request to be kept apprised of any development or upcoming meetings and that my comment be noted and considered **AM-7**

Thank you
Alison Martinez
(805) 896 2075 **AM-8**

9.5.2.1 Response to Letter from Alison Martinez

Comment No.	Response
AM-1	This comment raises concern regarding an increase in traffic, lighting, and noise, and neighborhood compatibility. Refer to JK-6, JK-7, and DMW-1, which addresses comments related to traffic congestion, hazards, and proposed roadway improvements and PH-1, which addresses comments related to neighborhood compatibility. As evaluated in Section 4.1, *Aesthetics* DRSP Design Guidelines include standards that address commercial, residential, and nonresidential outdoor lighting. The DRSP requires all lighting design and fixtures to be "dark-sky" compliant, consistent with the International Dark-Sky Association and/or County requirements. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance.
AM-2	This comment raises concern regarding roadway hazards and vehicle congestion. Refer to JK-6, JK-7, and DMW-1, which address comments related to traffic congestion, hazards, and proposed roadway improvements, including pedestrian and bicycle facilities.
AM-3	This comment raises concern regarding pedestrian and bicycle facilities. Refer to JK-6, JK-7, and DMW-1, which address comments related to proposed roadway improvements, including pedestrian and bicycle facilities.
AM-4	This comment raises concern regarding an increase in lighting. As evaluated in Section 4.1, *Aesthetics* DRSP Design Guidelines include standards that address commercial, residential, and nonresidential outdoor lighting. The DRSP requires all lighting design and fixtures to be "dark-sky" compliant, consistent with the International Dark-Sky Association and/or County requirements. As this issue is addressed in the EIR, no revisions are necessary.
AM-5	This comment raises concern regarding neighborhood compatibility and suggests an alternative with a gradual transition along the fringe. Refer to PH-1, which addresses comments related to neighborhood compatibility and AG-3, which addresses comments related to the alternatives analysis.
AM-6	This comment expresses support for the proposed visual screen along US 101 and suggests leaving oaks in this area. As evaluated in Section 4.1, *Aesthetics*, the project has the potential to alter the existing visual character of the project site through new development, grading, and loss of oak trees. Therefore, Mitigation Measures AES/mm-3.1 and AES/mm-3.2 were identified to require a visual screen comprised of planted oak trees along US 101. As this issue is addressed in the EIR, no revisions are necessary.
AM-7	This comment raises concern regarding flooding within the project area. As evaluated in Section 4.10, *Hydrology and Water Quality*, the Specific Plan Area does not lie within any designated floodplains. Each phase of project development would require a comprehensive drainage plan to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the Regional Water Quality Control Board (RWQCB) stormwater requirements and County Public Improvement Standards. Therefore, the EIR determined that with adequate implementation and maintenance of Stormwater Pollution Prevention Plans (SWPPPs), erosion and stormwater control plans, and drainage plans that would be required for any future development within the Specific Plan Area, the proposed project would not substantially alter the drainage pattern beyond the construction footprint and would not alter off-site drainage patterns. As this issue is addressed in the EIR, no revisions are necessary.
AM-8	This comment requests that notice of future development and/or meetings is provided to the community. This comment does not require any revisions to the EIR.

9.5.3 Jose Martinez

[EXT]Dana Reserve Project Draft EIR

Joe Martinez <infantry1sgt@gmail.com>
Mon 6/20/2022 8:46 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To whom it may concern,

I have read the report and I have some concerns regarding the draft EIR. This high-density housing project will no doubt have a significant impact on my neighborhood, yet the claims on the EIR clearly states that there will be no significant impact on the surrounding area. **JM-1**

Let's start with traffic on Ten Oaks, Glenhaven, and Hetrick. With the addition of nearly 1300 new residences and only two commuter roads through the project going to Willow Road, I believe traffic will get backed up and residents will be searching for an alternate manner to get to Willow Rd which will be through my neighborhood. These roads cannot safely host the current traffic much less any increase, which I am sure will increase due to this project. Hetrick, Glenhaven and Ten Oaks have no sidewalks or bike paths and the dangerous roadway is too narrow to have room to add such safety features. An alternative would be to close the street at Glenhaven and Hetrick which would require traffic to stay on Pomeroy to reach Willow Rd. The increased population for nearly 1300 residences will greatly increase traffic and the safety of the residents in the surrounding area. **JM-2**

Currently, Hetrick is bordered by 288 acres of open land filled with oak trees and grassland with great vistas and mountain views. Adjacent to this area are homes set on one acre lots. Placing nearly 1300 new residences on this beautiful land and eliminating a large number of mature oaks will cause much destruction to the neighborhood and surrounding area of Nipomo **JM-3**

I could continue to comment about the many points in the EIR which claims there would be no significant impact on the surrounding community but if you lived in the neighborhood, you would acknowledge this is not a true statement. Obviously, no one has spoken to anyone in the neighborhood or come and visited the area with these things in mind. All neighbors are very upset and distressed about this project and will continue to express their concerns at any upcoming meetings. Please send me the Zoom link when it is available for the July 14 public study session. **JM-4**

Regards,

Jose Martinez

9.5.3.1 Response to Letter from Jose Martinez

Comment No.	Response
JM-1	This comment raises concern regarding neighborhood compatibility. Refer to PH-1, which addresses comments related to neighborhood compatibility.
JM-2	This comment raises concern regarding roadway hazards and vehicle congestion. Refer to JK-6, JK-7, and DMW-1, which address comments related to traffic congestion, hazards, and proposed roadway improvements, including pedestrian and bicycle facilities.
JM-3	This comment raises concern regarding neighborhood compatibility and the loss of oaks at the project site. Refer to PH-1, which addresses comments related to neighborhood compatibility and MR-3, JK-4, and BR-1, which addresses comments related to loss of oaks.
JM-4	This comment raises concern regarding neighborhood compatibility and requests that the Public Study Session on July 14th is made available to the community. Refer to PH-1, which addresses comments related to neighborhood compatibility. This comment does not require any revisions to the EIR.

9.5.4 Jeff Edwards



7/22/22, 5:55 AM Gmail - Dana Reserve DEIR

Gmail

Jeff Edwards <jhedwardscompany@gmail.com>

Dana Reserve DEIR

Jennifer Guetschow <jGuetschow@co.slo.ca.us> Thu, Jun 23, 2022 at 11:00 AM
To: "jhedwardscompany_gmail.com" <jhedwardscompany@gmail.com>

Good morning,

Thank you for your email.

Please check the link again and let me know if you are not able to open it. If not, then please try this link:
Draft Program Environmental Impact Report - County of San Luis Obispo (ca.gov)

Thank you.

Jennifer

From: Jeff Edwards <jhedwardscompany@gmail.com>
Sent: Wednesday, June 22, 2022 7:58 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Subject: [EXT]Dana Reserve DEIR

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello Jennifer,

I have tried to access the DEIR and am having trouble. Please send me a link. It is unclear if the current link is live and may not have been since June 16th.

Thanks,

Jeff

Julie Tacker
Administrative Assistant

J.H. Edwards Company
P.O. Box 6070
Los Osos, CA 93412
805.235.0873 - Jeff
805.235.8262 - Julie
805.528.3569 - Office

https://mail.google.com/mail/u/0/?ik=81f501116f&view=pt&search=all&permmsgid=msg-f%3A1736449444059984103&dsqt=1&simpl=msg-f%3A17364... 1/1

JEd-1

9.5.4.1 Response to Letter from Jeff Edwards

Comment No.	Response
JEd-1	This comment identifies an issue with the accessibility of the EIR on the County of San Luis Obispo's website, which was quickly remedied. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.5 Gregg Reimers, PE

[EXT]Comments: Dana Reserve Draft Environmental Impact Report - SWCA Project No. 64873

G Reimers <greim416@gmail.com>
Mon 7/25/2022 2:14 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

1 attachments (20 KB)
Dana Reserve EIR Comments.docx;

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Please see attached for comments regarding the subject draft report. Upon review, my conclusion is that the draft Dana Reserve Specific Plan environmental impact report currently lacks sufficient detail and clarity to adequately demonstrate a "less than significant" impact on the affordability and sustainability of NCSD water to the existing community.

Thank you for the opportunity to review and comment.

Gregg Reimers, PE
556 Charro Way
Nipomo, CA 93444
805-610-5569

From: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Sent: Thursday, June 16, 2022 8:30 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Subject: Dana Reserve Draft Environmental Impact Report - Notice of Availability

Good morning,

*Please find attached the official **Notice of Availability for the Dana Reserve Draft Environmental Impact Report**. Please note, the public comment period closes on August 1, 2022. Thank you.*

Jennifer Guetschow
Project Manager

NOTICE OF AVAILABILITY

DRAFT ENVIRONMENTAL IMPACT REPORT

WHO: County of San Luis Obispo Department of Planning and Building

WHAT: A Draft Environmental Impact Report (DEIR) for the *Dana Reserve Specific Plan (PLN-1118, SUB2020-00047, LRP2020-00007, ED21-094)* is complete and available for

GRe-1

public review and comment. The document addresses the environmental impacts that may be associated with activities related to the adoption of the Dana Reserve Specific Plan (DRSP), including adoption of the Specific Plan, Conditional Use Permit for Oak Tree Removal and Grading/Impervious Surfaces, Vesting Tentative Tract Map (VTTM) 3159, Development Agreement, annexation into the Nipomo Community Services District's (NCSD) service area for provision of water and wastewater services, and a County-initiated General Plan Amendment to change the land use categories within the Specific Plan Area and reflect the proposed incorporation of the Specific Plan Area into the Nipomo Urban Reserve Line (URL). The *Dana Reserve Specific Plan* is a primarily residential project with a majority of the Specific Plan Area designated for residential uses, which would accommodate up to 1,289 single- and multi-family residential units. The DRSP would also allow for the future phased development of village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the Specific Plan Area. State Clearinghouse #2021060558.

The Specific Plan Area is within the Residential Rural land use category on three adjoining parcels totaling approximately 288 acres, including Assessor's Parcel Numbers (APNs) 091-301-030, 091-301-031, and 091-301-073, and is adjacent to the northern boundary of the Nipomo Urban Reserve Line and NCSD service area. The project site evaluated in the EIR also includes offsite water, wastewater, and transportation improvement areas located within the vicinity of the Specific Plan Area.

GRe-1
(cont'd)

WHERE: The DEIR is available for review or downloading on the Planning Department's web site at: https://www.slocounty.ca.gov/Departments/Planning-Building/Grid-Items/Community-Engagement/Active-Planning-Projects/Dana-Reserve-Specific-Plan.aspx. Copies of the DEIR, and all documents referenced in the DEIR, are also available for review at the County Department of Planning & Building, 976 Osos St., Rm 300, San Luis Obispo. Due to COVID-19 restrictions, it is recommended that you

contact the project manager (contact information below) to arrange for an appointment. A copy of the DEIR is also available for review at the Nipomo Library (see SLOLIBRARY.org for hours and COVID-19 requirements).

HOW TO COMMENT OR GET MORE INFORMATION:
Anyone interested in commenting on the DEIR should email your comments or questions to: jGuetschow@co.slo.ca.us or submit a written statement directed to Jennifer Guetschow of the San Luis Obispo County Department of Planning and Building at 976 Osos St., Rm 300, San Luis Obispo, CA 93408. Comments must be received between **June 16, 2022** and **August 1, 2022.**

If you need more information about this project, please contact Jennifer Guetschow at (805) 788- 2352.

ENVIRONMENTAL IMPACTS:

The EIR focuses on the following issues: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

Per CEQA Section 15087(c)(6), based on a search of the California Department of Toxic Substance Control's EnviroStor database, the State Water Resources Control Board's GeoTracker database, and CalEPA's Cortese List website, there is one open cleanup program site located within the offsite water system improvement area near the Tefft and Carrillo Streets intersection.
<https://geotracker.waterboards.ca.gov/>.

PUBLIC STUDY SESSION
The project will be presented at a public study session before the San Luis Obispo County Planning Commission on July 14, 2022, beginning at 9:00 a.m. Planning Commission meetings are currently being held virtually. For information on how to attend virtually (via Zoom platform), refer to the agenda on the Planning Commission Meetings website: https://www.slocounty.ca.gov/Departments/Planning-Building/Grid-Items/Meetings,-Hearings,-Agendas,-and-Minutes/Planning-Commission-Meetings.aspx. **This date is potentially subject to change.**

GRe-1
(cont'd)

The project is also planned to be presented at a public study session before the San Luis Obispo County Local Agency Formation Commission (LAFCO) on July 21st, beginning at 9:00 a.m. LAFCO meetings may be held virtually. For information on how to attend the LAFCO study session, refer to the agenda on the LAFCO meetings website: https://www.slolafco.com/commission-meetings. **This date is potentially subject to change.**

DATED: June 16th, 2022
Jennifer Guetschow
Supervising Planner

Comments on the Dana Reserve Specific Plan
Draft Environmental Impact Report
SWCA Project No. 64873, Dated June 2022
By: Gregg Reimers
556 Charro Way, Nipomo
805-610-5569

1. Section 2.1.1 states 1,259 residential units are planned. The expected population that will occupy those units is not provided. Assuming 2.5 people per unit (which is conservatively low) equates to 3,222 people. The NCSD 2020 Urban Water Management Plan (MKN Final December 2021) (NCSD website: 2020 Water Management Plan), Table 3-1a, estimates the population served with water to be 14,223 in the year 2025. Should the DRSP be completed on or about 2025, that's a 22.3 percent increase! The 5 year historical growth rate from 2015-2020 was only 1.3 percent. Additionally, the same planning report (also prepared by MKN) predicts a 2045 water usage population of 16,031 people. That's a planned growth rate of less than 1 percent per year. Regardless of the year of completion, the DRSP will exceed the 2045 planning basis. This must be considered adverse.

   The proposed population increase resulting from the DRSP alone will exceed current NCSD planning by an order of magnitude and potentially decades early. This is definitely not 'Less Than Significant.' The subject EIR should not be approved as it fails to reconcile this significant growth rate difference with that of the NCSD water management planning report.

GRe-2

2. The groundwater evaluation documented in Section 4.19.1.1.2 is based on an annual average precipitation of 15.65 inches. This value is based on data going back to 1958, a very broad time frame. Given that climate change has been recently recognized as a threat, the 1958 basis conservatively biases the average rainfall high. Data tabulating the yearly average rainfall is documented in a "Technical Memorandum from Brad Newton, Ph.D., P.G. to Mario Iglesias, General Manager NCSD Dated December 22,2021" (NCSD website: Technical Memorandum). From 2012 to 2021 the average rainfall was only 13.49 inches. Additionally, the "Nipomo Mesa Management Area 2022 Key Wells Index-Severe Water Shortage Conditions" (NSCD website: NCSD Key Well Index) indicates that the groundwater index has been below the "severe criterion" threshold since 2015.

GRe-3

   The subject EIR should not be approved until it addresses recent climate change trends, local and state wide. The baseline for EIR comparison should be the current Stage IV drought conditions. The EIR should rely on a shorter historical reference (e.g. past 10

GRe-4

years) to predict if, and when, the NCSD can recover from the current "Stage IV" drought conditions. Starting from an actual *severe* water shortage and demonstrating a *less than significant* impact will necessitate a more detailed study. The EIR should consider reductions of the Santa Maria supplemental water supply resulting from potential state mandates. Non-conformances / deviations from the NCSD strategic plan (NCSD website: Strategic Plan) regarding water affordability and sustainability should also be documented.

GRe-4 (cont'd)

3. Section 4.19.3 "Thresholds of Significance," Item (b), states that one of the significance thresholds is based on sufficient water being available "…to serve the project and reasonably foreseeable development…" As presented in Comment #1 above, the population increase associated with DRSP project would preclude any other future development based on the NCSD 2020 Urban Water Management Plan (MKN Final December 2021) (NCSD website: 2020 Water Management Plan). That is a 'Significant' impact.

GRe-5

4. An obvious omission from Section 4.19.3 is a threshold relating to how long project implementation may extend or necessitate the reinstatement of NCSD water shortage restrictions. Any adverse impact would not be considered 'less than significant' as a Stage IV shortage is classified as 'severe.'

GRe-6

5. Section 4.19.6 "Water," concludes that "…potential project impacts would be potentially cumulative considerable, and the cumulative impacts related to water supply would be less than significant with mitigation."

GRe-7

   a. Please clarify what considerable but less than significant actually means.
   b. "Executive Summary," Section 4, Goal #13, reads "To meet or exceed the requirements of the Nipomo Community Services District (NCSD) District Code to ensure that the DRSP constructs the water and wastewater infrastructure necessary to serve the project without adverse impacts on the NCSD's ability to serve existing and future users." The phrases '*without adverse impacts*,' 'cumulatively considerable,' and 'less than significant' have entirely different meanings. Please provide a more detailed basis to justify a 'Class III less than significant impact' conclusion. Also address the failure to meet DRSP Goal #13.

GRe-8

   c. "Executive Summary," Section 5, Significant Environmental Impact Identified, Table ES-2, HYD Impact 3 (Pg. ES-51), reads in part "The project could substantially decrease groundwater supplies…" The impact response states that "Mitigation is not necessary." This directly contradicts the Section 4.19.6 "Water" conclusion. What differentiates 'substantially' from 'not significantly?'

GRe-9

d. Add a definition section to the EIR. Include qualitative terms and phrases used in the report. This is necessary to assist the reader in validating the authors conclusions regarding the relative scale or magnitude of an effect (e.g. substantially but not significantly; without adverse impacts; cumulatively considerable; less than significant; and etc.). Better yet, consistently use a more limited set of terminology. GRe-10

6. Explain why there is no conflict of interest in MKN authoring both the subject EIR and the NCSD planning report. GRe-11

7. What is the basis for, and sizing criteria applied to, the installation of 2 million gallons of additional water tank storage at the NCSD's existing Foothill water tank site at the North Dana Foothill Road and East Tefft Street intersection and a second water storage tank at the NCSD's existing Joshua Road pump station? Is the additional storage necessary to accommodate periods of peak water demand and / or ensure adequate head throughout the NCSD distribution system? GRe-12

Conclusion:

The draft Dana Reserve Specific Plan environmental impact report currently lacks sufficient detail and clarity to adequately demonstrate a "less than significant" impact on the affordability and sustainability of NCSD water to the existing community. GRe-13

9.5.5.1 Response to Letter from Gregg Reimers, PE

Comment No.	Response
GRe-1	This comment expresses concern related to the affordability and sustainability of Nipomo Community Services District (NCSD) water supply. The NCSD has prepared a Water and Wastewater Rate Impact Analysis Study for the proposed project, which concludes that implementation of the project would ultimately reduce water and wastewater rates for NCSD customers; however, economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. The NCSD also recently adopted its 2020 Urban Water Management Plan (UWMP), which characterizes the District's existing and future water supply during normal, single-dry, and multiple-dry year conditions. As identified in Section 19, *Utilities and Service Systems*, of the EIR, the UWMP concludes that based on the existing infrastructure of the Nipomo Supplemental Water Project (NSWP), and contractual obligations between the NCSD and City of Santa Maria, water supply from Santa Maria is considered reliable and would be available during normal, single, and multiple dry year conditions. Further, based on several active wells and current operational practices groundwater supply is considered reliable and would be available during normal, single, and multiple dry year conditions. Additionally, a Water Supply Analysis (WSA) per the requirements of Senate Bill (SB) 610 was prepared for the proposed project, which concluded (consistent with the 2020 UWMP) that the NCSD would have adequate available water supply to supply water for the proposed project at full-buildout during normal, single-dry, and multiple-dry year conditions. Inevitably, there is a certain level of uncertainty regarding the availability of future water supplies, particularly given recent drought conditions, climate change, and the years-long anticipated build-out schedule of the project. Therefore, even though the analysis in the EIR consistently shows adequate water supply to serve the project, the EIR conservatively included Mitigation Measure USS/mm-3.1, which requires that prior to the issuance of development permits for any future project development phase, the project developer is required to provide proof of water supply sufficient to meet the estimated water demand for proposed development. The results of the UWMP and WSA were summarized in detail in Section 19, *Utilities and Service Systems* of the DRSP EIR. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact; therefore, no changes in the environmental document are necessary. Refer to MR-1, which includes a detailed response related to groundwater supply and management.
GRe-2	This comment expresses concern related to the consistency between the available water supply for the population projections included in the UWMP and the DRSP EIR. As identified in Section 3.4.1 of the UWMP, Growth Scenario 1, which identifies a population of 18,398 people in the year 2045, was used to determine future water supply projections. This population projection includes the existing NCSD population, infill development within the existing service area (parcels with reserved NCSD capacity, parcels currently served by private wells, and development of vacant parcels), and future population associated with annexations under review. Annexation of the DRSP area was under review at the time of preparation of the UWMP; therefore, the project population from buildout of the DRSP is included in the population projections throughout the UWMP. Section 14, *Population and Housing*, of the DRSP EIR identifies an increase of 4,555 new residents and 273 new employees (4,828 people) as a result of full buildout of the proposed project. Potential impacts of a population growth of 4,828 new people on the NCSD water supply was evaluated in Section 19, *Utilities and Service Systems* of the DRSP EIR, which exceeds the estimates noted by this commenter. According to the UWMP, the NCSD would have a water surplus of 440 acre-feet per year (AFY) in the year 2045 under multiple dry-year conditions. According to the WSA prepared for the project, at full buildout, the project would have a water demand of 370 AFY; therefore, the NCSD is projected to have sufficient water supply to serve the additional demand of 370 AFY generated by the proposed project. Mitigation Measure USS/mm-3.1 requires that prior to the issuance of development permits for any project phase, the project developer is required to provide proof of water supply sufficient to meet the estimated water demand for proposed development. In addition, Section 14, *Population and Housing*, of the DRSP EIR concluded that an increase of 4,286 new people within the community would result in a Class I impact; therefore, concern related to substantial population growth expressed in this comment is consistent with the evaluation included in the DRSP EIR, and no changes in the environmental document are necessary. Refer to MR-1, which includes a detailed response related to groundwater supply and management.
GRe-3	This comment raises concern over the reliability of groundwater supply based on drought conditions. The UWMP uses the average annual rainfall rate of 15.65 inches to evaluate the NCSD's water supply, which was summarized in the DRSP EIR. While precipitation varies over time, those changes are accounted for in the single-dry and multiple-dry year conditions that were evaluated in the UWMP. The DRSP EIR conservatively includes Mitigation Measure USS/mm-3.1 to address future development proposals that may be brought forward during any abnormally low rainfall year in the future in order to ensure there is adequate water supply to serve the existing NCSD service area and the proposed development. Therefore, no changes in the environmental document are necessary. Refer to MR-1, which includes a detailed response related to groundwater supply and management.

Comment No.	Response
GRe-4	This comment asserts that the EIR does not adequately address recent local and statewide climate change trends. The EIR includes an evaluation of the NCSD Water Supply under normal, single-dry, and multiple-dry year conditions. The multiple dry-year condition reflects severe drought conditions. As evaluated in Section 19, *Utilities and Service Systems*, there would be a projected average water surplus of approximately 610 AFY following the fifth year of multiple dry year conditions, which is also considered the worst-case scenario available groundwater supply. Therefore, the NCSD would have sufficient water supply to serve existing and reasonably foreseeable future demands during normal, single dry, and multiple dry year conditions. Additionally, the EIR includes a discussion of the UWMP's Water Shortage Contingency Plan (WSCP), which was prepared in accordance with California Water Code Section 10632(a)(3). The WSCP identifies the basin's current drought conditions in addition to potential future conditions and identifies measures to address these conditions. As this discussion is included in the EIR, no changes in the environmental document are necessary. Refer to MR-1, which includes a detailed response related to groundwater supply and management.
GRe-5	This comment raises concern over the population increase associated with the proposed project as it relates to water management planning. Please refer to GRe-2 which responds to comments regarding the availability of existing and future water supply for the projected project population during normal, single-dry, and multiple-dry year conditions. Population projections included in the UWMP include the existing NCSD population, infill development within the existing service area (parcels with reserved NCSD capacity, parcels currently served by private wells, and development of vacant parcels), and future population associated with annexations under review. Annexation of the DRSP area was under review at the time of preparation of the UWMP; therefore, the project population from buildout of the DRSP is included in the population projections throughout the UWMP and implementation of the project would not preclude future development within the NCSD service area. The comment does not identify any deficiency in the EIR; therefore, no changes in the environmental document are necessary. Refer to MR-1, which includes a detailed response related to groundwater supply and management.
GRe-6	This comment asserts that Section 4.19.3, *Utilities and Service Systems Thresholds of Significance*, omits a threshold related to how long project implementation may extend or necessitate the reinstatement of NCSD water shortage restrictions. As identified in this section of the EIR, the determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County and are derived from CEQA Appendix G. As such the threshold identified by this commenter is not included in the EIR; however, a discussion of future water supply and the UWMP WSCP is included in the EIR. As this discussion is included in the EIR, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
GRe-7	This comment requests clarity of the phrase "less than significant" as used throughout the EIR. The term "significance" is used throughout the EIR to characterize the magnitude of the projected impact. For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the project area or the area adjacent to the project. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant and insignificant impacts. To the extent feasible, distinctions are also made between regional and local significance and short-term versus long-term duration. Chapter 4, *Environmental Impact Analysis*, includes the following descriptions of the criteria used to classify residual impacts: • A *significant and unavoidable impact* would cause a substantial adverse effect on the environment that meets or exceeds the applicable significance criteria thresholds for a particular resource, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level. • A *less-than-significant impact with mitigation* is an adverse impact that would cause a substantial adverse effect that meets or exceeds the applicable significance criteria thresholds for a particular resource but can be reduced to a less-than-significant level through successful implementation of identified mitigation measures. • A *less-than-significant impact* is an adverse impact that does not meet or exceed the applicable significance criteria thresholds for a particular resource. Generally, no mitigation measures are required for less-than-significant impacts; only compliance with standard regulatory conditions would be required. However, mitigation may still be recommended should the lead or responsible agencies deem it appropriate to reduce the impact to the maximum extent feasible, as long as there is rough proportionality between the environmental impacts caused by the project and the mitigation measures imposed on the project. These definitions are included in the EIR. As such, the comment does not identify any deficiency in the EIR; therefore, no changes in the environmental document are necessary. Nevertheless, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

Comment No.	Response
GRe-8	This comment requests a clear justification of a "less than significant" conclusion. Please refer to GRe-7, which responds to comments regarding the criteria used to classify residual impacts. This comment also asserts that the project fails to meet Goal 13 of the DRSP that states, "To meet or exceed the requirements of the Nipomo Community Services District (NCSD) District Code to ensure that the DRSP constructs the water and wastewater infrastructure necessary to serve the project without adverse impacts on the NCSD's ability to serve existing and future users." Refer to GRe-1 and GRe-2, which responds to comments regarding the availability of existing and future water supply for the projected project population during normal, single-dry, and multiple-dry year conditions. Based on the availability of water for the proposed project, this comment does not identify any deficiency in the EIR; therefore, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
GRe-9	This comment identifies that no mitigation was identified to reduce impacts related to HYD Impact 3, which is inconsistent with the conclusion of USS Impact 3. HYD Impact 3 evaluates potential project impacts related to groundwater recharge into the underlying basin, which could reduce groundwater supply. The NCSD relies on water from the Nipomo Supplemental Water Project (NSWP) and groundwater as its two primary water sources, with the majority of its water supply coming from the NSWP. As such, the project would not solely rely on groundwater resources to provide for the proposed project and impacts related to decreasing groundwater supply would be less than significant. Mitigation Measure USS/mm-3.1 is identified in Section 19, *Utilities and Service Systems*, to ensure there is adequate water supply to serve the project prior to buildout of concurrent project phases. Mitigation Measure USS/mm-3.1 could inadvertently reduce potential to substantially decrease groundwater supply by ensuring future project phases are not developed if there is not enough available water supply, including groundwater supply; however, this mitigation measure would not be necessary to reduce significant project impacts. This comment also requests a clarification of phrases used throughout the EIR, including the difference between the terms "substantially" and "significantly" as used in HYD Impact 3. Impact statements used throughout the DRSP EIR are based on thresholds established by CEQA Statute and Guidelines Appendix G and the County. As identified by CEA and the County, the project would be considered to have a significant effect on hydrology and water quality if the project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. As evaluated in Section 4.10, *Hydrology and Water Quality*, implementation of the project would not interfere with groundwater recharge into the basin. Therefore, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
GRe-10	This comment requests clarity of the qualitative terms and phrases commonly used throughout the EIR, which are used to describe the magnitude of an effect. Please refer to GRe-7, which responds to comments regarding phrases used to characterize the magnitude of the projected impact. These definitions are included in the EIR. As such, the comment does not identify any deficiency in the EIR; therefore, no changes in the environmental document are necessary. Nevertheless, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
GRe-11	This comment raises concern regarding a potential conflict of interest having MKN and Associates (MKN) author both the subject EIR and the NCSD planning report. Section 19, *Utilities and Service Systems* of the EIR is based on the *2020 Nipomo Community Services District Urban Water Management Plan* (UWMP; MKN 2021), *Dana Reserve Water and Wastewater Service Evaluation* (Dana Reserve Water and Wastewater Evaluation; MKN 2022), and *Dana Reserve Water Supply Assessment* (WSA; Rick G Sweet and RRM Design Group 2021); however, is authored by SWCA. The EIR is supplemented by reports from both MKN and Rick G Sweet and RRM Design Group as well as direct communication with the County and the NCSD. Therefore, no changes in the environmental document are necessary.
GRe-12	This comment requests clarification regarding the sizing criteria for the proposed Foothill water tank. The project includes the implementation of off-site water and wastewater improvements that were identified by the NCSD in the *Dana Reserve Water and Wastewater Service Evaluation* as necessary to serve the existing service area in addition to the proposed project. These improvements were identified in the are described in Chapter 2, *Project Description*, and Section 4.19, *Utilities and Service Systems* of the EIR. The comment does not identify any deficiency in the EIR; therefore, no changes in the environmental document are necessary.
GRe-13	This comment restates the initial concern related to the affordability and sustainability of the NCSD water supply. Refer to GRe-1, which responds to this comment.

9.5.6 Judd King

[EXT]Dana Reserve Specific Plan - Draft EIR comments

Judd King <jkingesp@gmail.com>
Sun 7/10/2022 11:09 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

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Hello,
I am submitting the following comments regarding the Dana Reserve Specific Plan Draft EIR. Thank you for your consideration of these observations and questions.

Water
We are in a long term drought. Section 4.19.1 details an analysis of water demand projected out for the project vs availability from NCSD. This analysis assumes a consistent availability of water delivery from the City of Santa Maria through the supplemental NCSD water pipeline. The City of Santa Maria sells water they receive from the coastal branch of the State Water Project. Should there be further analysis performed to consider a reduction of available water from Santa Maria due to lack of State Water Project delivery? The State Water Project is often threatening no water delivery or only a few percentage points. JK-1

Wastewater
The project will increase water demand from the existing system. Should improvements to the WRF on Southland also consider some form of additional treatment system for indirect potable reuse or direct potable reuse? The percolation ponds at the plant largely replenish the area in the south of the community where there may not be any wells that are used for utility purposes. JK-2

Utilities
There will be needed upgrades at the existing Southland WRF and other water and wastewater infrastructure improvements. How will these be paid for? If this project impacts the NCSD system then why should other ratepayers be required to float the costs. Inflationary pressures will increase the cost of the proposed improvements. Have there been sufficient cost estimates to determine if developer fees and current rates will offset the future costs of these improvements? JK-3

Oak Mitigation and Habitat
This project has been compared to the Woodlands (Monarch Dunes) where thousands of eucalyptus trees were removed for that project. Eucalyptus trees do serve as habitat for various species, but they are not native. This project plans to remove a significant amount of oak trees and associated habitat. The layout of the villages does appear to try to preserve some of the closed oak woodland within the center of the parcel. However, the layout of the villages essentially clears entire areas of oak woodland and chaparral. The off-set mitigation parcel is located 2.1 miles east of the site. I know this area. I grew up just southeast of the parcel that will be used to "offset" the destruction of habitat. I am glad to see that the parcel used for offset will not be developed, but only a handful of people have ever seen or will ever see that parcel. It is steep, rough terrain. Isn't the purpose of conservation and off-set preservation to give people an opportunity to see the habitat? The layout of the project should be revised to further reduce impacts to oak woodlands and other habitat. Clear cutting of oak forests should be prevented. Goal BR-1 even identifies a lack of conservation and replacement of the 3,943 oaks that would be removed. The proposed conservation/off-set plan is insufficient and lacks the intent of true conservation and adherence to the county and CEQA regulations. JK-4 JK-5

The project layout should be revised to reduce the oak habitat taken. JK-5 (cont'd)

Transportation

Nipomo has become a true commuter community. The EIR even acknowledges the lack of commercial/jobs in the area? THe project appears to continue the mindset of pushing workforce housing to areas that are unincorporated in SLO county. Planning and zoning in Nipomo has focused on concentrating commercial/retail to one area (Tefft Street between US 101 and Pomeroy) with this continuing on Frontage Road. If phasing of the project focuses on building residential housing before commercial/retail then traffic will likely increase and congestion worsen in the current Tefft Street corridor. Are traffic impact fees going to offset the amount of improvements that may be required to improve existing intersections. Traffic impact fees are collected from developers with the intent of implementing infrastructure improvements. San Luis Obispo County and the cities within the county have not enacted these improvements in a timely manner. There is often a several year lag between the houses and retail being constructed when local agencies design, bid and construct a project intended to address traffic impacts. Several examples include: Prado Road Interchange, Los Osos Valley Road Interchange, Brisco Road Interchange, Vineyard Drive Interchange and Tefft Street Interchange. Willow Road Interchange was significant to improving the traffic flow from developments off Willow Road and the Woodlands, but was constructed several years after those developments were started. JK-6 JK-7

The developer should be required to implement infrastructure improvements that will immediately impact the traffic and transportation of the Nipomo Community. Traffic impact fees for long term improvements should also be collected.

Sincerely,
Judd King
Atascadero, CA
Resident of Nipomo (1980-1998, 2014-2017)

9.5.6.1 Response to Letter from Judd King

Comment No.	Response
JK-1	This comment identifies current drought conditions and raises concern over the reliability of the NCSD water supply through the NSWP. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments regarding the evaluation of the NCSD water supply during normal, single-dry, and multiple-dry year conditions.
JK-2	This comment questions whether improvements to the Southland Wastewater Treatment Plant (WWTP) are necessary to create an additional treatment system for indirect potable reuse or direct potable reuse of wastewater. This comment recognizes that the percolation ponds at the Blacklake WRF largely replenish the area in the south of the community where there may not be any wells that are used for utility purposes. The project includes the implementation of off-site water and wastewater improvements that were identified by the NCSD in the *Dana Reserve Water and Wastewater Service Evaluation* as necessary to serve the existing service area in addition to the proposed project. These improvements were identified in the are described in Chapter 2, *Project Description*, and Section 4.19, *Utilities and Service Systems* of the EIR. According to CEQA Guidelines, a project is only required to implement improvements necessary to serve the proposed project. Therefore, additional improvements to NCSD infrastructure would not be the responsibility of the applicant. As such, no changes in the environmental document are needed.
JK-3	This comment raises concern over the cost of improvements to the Southland WWTP to existing rate payers. The project includes the implementation of off-site water and wastewater improvements that were identified by the NCSD in the *Dana Reserve Water and Wastewater Service Evaluation* as necessary to serve the existing service area in addition to the proposed project. The applicant would be responsible for implementation of these improvements. The NCSD has prepared a Water and Wastewater Rate Impact Analysis Study for the proposed project, which concludes that implementation of the project would ultimately reduce water and wastewater rates for NCSD customers; however, economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact; therefore, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
JK-4	This comment expresses concern over the loss of oak trees at the project site and also asserts that the off-site mitigation area is not located in an area that would provide public access to preserved areas. As evaluated in Section 4, *Biological Resources*, of the DRSP EIR, the purpose of the off-site mitigation area is to preserve oak woodland habitat at the off-site mitigation area in perpetuity. Although this mitigation has been included, a Class I impact was identified regarding the loss of oak trees at the site; therefore, this comment does not include new information that would change the analysis of the DRSP EIR. The primary purpose of the off-site mitigation area is permanent conservation, not public enjoyment or use. It is possible that, in the future, there could be a desire to improve the site (consistent with the terms of the permanent conservation easement) to allow some limited public use (e.g., as an open space area, or by providing public views); however, no such activities are currently proposed. Additionally, as evaluated in Section 4.1, *Aesthetics*, of the DRSP EIR, implementation of the project would alter the existing visual character of the project area and was also classified as a Class II impact. As such, concern related to the alteration of the visual character of the project site, including the loss of availability to view oak trees at the site, is consistent with the evaluation included in the DRSP EIR; therefore, no changes in the environmental document are needed. Refer to MR-3, which provides a detailed response related to the loss of oak trees and other impacts to biological resources.
JK-5	This comment raises concern of the loss of oak trees at the project site and expresses that the conceptual layout should be revised to reduce impacts to sensitive habitat. A range of project alternatives were evaluated in Chapter 5, *Alternatives Analysis,* including the Development on Non-Native Grassland alternative (Alternative 4), which was developed to address the project's significant impacts related to biological resources. Alternative 4 limits development to non-native grassland areas on the project site to avoid the loss of oak trees and other native habitats. However, this alternative would increase the density of residential development to maximize the buildout of single-family residential dwellings on the non-native grassland habitat throughout the project site. This alternative was determined to have similar impacts to the proposed project in all areas except for biological resources, which is consistent with the intent of this comment. No changes in the environmental document are necessary. Refer to MR-3, which provides a detailed response related to the loss of oak trees and other impacts to biological resources.
JK-6	This comment raises concern of an increase in traffic congestion along the Tefft Street corridor. As evaluated in the Transportation Impact Study (TIS) and Vehicle Miles Travelled (VMT) Analysis prepared for the proposed project, although the project would result in an increase in vehicle trips in the vicinity of the project site, the construction of two additional collector roads (Collector A and Collector B) through the site to connect to Willow Road from North Frontage Road and Pomeroy Road, respectively, would ultimately reduce

Comment No.	Response
	traffic congestion along the Tefft Street corridor, alleviating existing and potential future congestion issues. Refer to JK-7, which identifies proposed additional transportation improvements intended to alleviate existing and potential future transportation issues. In addition, the conceptual phasing plan includes the construction of Collectors A and B during Phase 1 and Phase 2 of the project, which would avoid increasing traffic congestion along the Tefft Street corridor during buildout of the project. The conceptual development plan includes the construction of commercial development during Phase 1 of the proposed project. Further, the DRSP proposes the extension of public transit through the site along Collector A where the higher-density residential neighborhoods would be developed along with the Specific Plan Area's employment centers. Collector A would include a Park and Ride lot, and implementation of Mitigation Measure TR/mm-2 would highlight transportation services, such as dial-a-ride and rideshare, available for residents and employees. The beneficial effects of construction of Collectors A and B and other improvements on traffic congestion ~~is~~are evaluated throughout the DRSP EIR. All roadway improvements would be conducted in accordance with County requirements to avoid hazardous roadway design. Therefore, no changes in the environmental document are needed.
JK-7	This comment suggests that the project developer should be required to implement infrastructure improvements that will immediately impact the traffic and transportation network in the community of Nipomo in addition to the payment of traffic impact fees. Buildout of the DRSP includes installation of transportation improvements identified by the County and the California Department of Transportation (Caltrans) as a means of improving traffic congestion issues in the area and reducing roadway hazards. The project includes the construction of the following transportation improvements to serve the proposed project and alleviate existing transportation issues within the community: • An extension of North Frontage Road at the southeast corner of the Specific Plan Area from Sandydale Drive to Willow Road. This improvement would be completed as a part of the project, providing site access from two of the four project entries. This improvement must be completed as part of the first phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 1, 2, 3, 5, and 10) and the village commercial, flex commercial, hotel, and educational uses. Left-turn lanes would also be provided at intersections along Collector A. • Widening of Willow Road and signalization at the Willow Road/Collector A intersection within existing ROW areas. This improvement must be completed as part of the first phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 1, 2, 3, 5, and 10) and the village commercial, flex commercial, and educational uses. • Restriping and one-way stop-control at the Willow Road/Collector B intersection within existing ROW areas. This improvement must be completed as part of the second phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 7, 8, and 9). • Improvements/paving at the Cherokee Place/Collectors A and B intersections. These improvements must be completed as part of the first and second phases of development, respectively, and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 1, 2, 3, 5, and 10 and Neighborhoods 7, 8, and 9, respectively). Although the road will not provide the fastest or most convenient route to most destinations, a small amount of project traffic may use the route to access neighborhoods off Hetrick Avenue. Road maintenance concerns would be addressed through a private road maintenance agreement entered into by owners of the access road easement or adjacent parcel owners. This requirement would be included in the Development Agreement. • Removal/closure of the privately maintained Hetrick Avenue access from Pomeroy Road and provision of a new access to Hetrick Avenue from Collector B. This improvement must be completed as part of the second phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 7, 8, and 9). • Restriping and one-way stop control at the Pomeroy Road/Collector B intersection within existing ROW areas. This improvement must be completed as part of the second phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 7, 8, and 9). • Emergency access at Hetrick Avenue and Cory Way. In addition, fair-share contributions to other off-site improvements such as the new traffic signals at Willow Road/US 101 northbound and southbound ramps would be required as part of the individual projects within the Specific Plan Area boundaries. These improvements would include the new traffic signals at Willow Road/US 101 NB and SB ramps, US 101/Tefft Street interchange improvements, and construction of an additional US 101 interchange at Southland Street, south of the US 101/Tefft Street interchange. All off-site transportation improvements would be implemented by the County and/or Caltrans and would be designed and constructed to meet the minimum requirements identified in the County's Public Improvement Standards and similar set of Caltrans design and construction specification standards. Proposed road improvements would be conducted during Phases 1 and 2 of the proposed project to avoid creating traffic congestion and associated hazards during buildout of the proposed project. Improvements would be constructed in accordance with County Public Works and Caltrans requirements to avoid hazardous roadway design. Proposed transportation improvements would operate acceptably as proposed and would not include geometric design features that would create new hazards or an incompatible use. Additionally, as identified in Section 4.17, *Transportation*, the project would be subject to the payment of the

Comment No.	Response
	adopted South County Traffic Impact Fee based on the latest adopted Fee Area 1 schedule and the number of net new weekday PM peak hour trips as estimated based on the trip generation letter. According to CEQA Guidelines, a project is only required to implement improvements necessary to serve the proposed project. Therefore, additional transportation improvements would not be the responsibility of the applicant. These components are addressed in the EIR; therefore, no changes in the environmental document are necessary.

9.5.7 Sue Shaleen

[EXT]Nipomo development

sue shaleen <suequilting@gmail.com>
Tue 7/12/2022 9:53 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello my name is Susan SHALEEN I live at Glenhaven Pl, Nipomo. I'm writing you in regards to the development being proposed on 288 acre in Nipomo.
This is close to our house and the impact will be great. With the development of Monarch Dunes homes we have seen a crushing impact. We have ONE grocery store, ONE major pharmacy. We have seen the store shelves run out of products and the wait at our pharmacy has become very long. The impact it will have on our town is unacceptable. **SSh(1)-1**
The county will not close the Glenhaven/ Hetrick tight corner BUT will Allow the undeveloped part of Hetrick Rd. To be given to the developers to add to the lots along that side. WE paid taxes on this for over 45 years, many use it as a walking trail for humans, dogs, and horses. Unacceptable! **SSh(1)-2**

The safety issue of the corner of Glenhaven and Ten Oaks is very dangerous, as well as increased traffic, used as a short cut to Willow Road. Does the county want to align with developers or care for the taxpayers of Nipomo? **SSh(1)-3**
The loss of trees is a heartfelt issue. I understand there will be a replanting across Hwy. 101. The trees to be removed are older, the new ones cannot replace the age of these. There will not be mature green scape in this development, only excessive density housing. **SSh(1)-4**
Nipomo has carried the brunt of the county and states desire to have more housing, San Luis Obispo is a large county let them look elsewhere. I strongly oppose this project and ask the county yo reconsider moving forward. **SSh(1)-5**
Thank you
Susan SHALEEN

9.5.7.1 Response to Letter from Sue Shaleen

Comment No.	Response
SSh(1)-1	This comment raises concern over the availability of commercial services (i.e., grocery stores, etc.) within the community and the impact of the project on existing services. Section 14, *Population and Housing*, of the EIR concludes that the project would have a Class I ~~impacts~~impact related to substantial population growth in the community, which is consistent with the intent of this comment. The DRSP includes a conceptual development plan in which commercial uses would be constructed during Phase 1, which may alleviate existing supply and demand issues in the community. However, CEQA does not require an evaluation of a project on commercial goods and services; therefore, this comment does not identify a deficiency in the EIR and no changes in the environmental document are necessary.
SSh(1)-2	This comment raises concern regarding the availability of walking trails following project implementation. As described in Chapter 2, *Project Description*, the project includes the construction of pedestrian, bicycle, and equestrian trails throughout the project site, which would provide the existing and future community with recreational opportunities. Therefore, this comment does not identify a deficiency in the EIR and no changes in the environmental document are necessary.
SSh(1)-3	This comment raises concern over traffic safety at the corner of Glenhaven and Ten Oaks, which is used as a short cut to Willow Road. As discussed in Section 4.17, *Transportation*, the project includes the construction of two additional collector roads (Collector A and Collector B) through the site to connect to Willow Road from North Frontage Road and Pomeroy Road, respectively, which would reduce vehicle traffic at the corner of Glenhaven and Ten Oaks. Refer to JK-6 and JK-7, which responds to comments regarding traffic congestion, vehicle safety, and transportation improvements. This comment does not identify a deficiency in the EIR and no changes in the environmental document are necessary.
SSh(1)-4	This comment expresses concern over the loss of oak trees at the project site and asserts that the removal of mature oak trees would change the visual landscape of the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
SSh(1)-5	This comment asserts that an alternative location for the project should be explored. A range of project alternatives were evaluated in Chapter 5, *Alternatives Analysis,* including the Alternative Location alternative, which was developed to address the project's significant impacts related to ~~development in~~development at the site. This alternative evaluates impacts related to development of the project at a different location in the county. However, this alternative was ultimately dismissed in accordance with State CEQA Guidelines Section 15126.6(c) because this alternative is infeasible, would not reduce the project's significant impacts, and would not meet the basic project objectives. Since this alternative was evaluated in the DRSP EIR, no changes in the environmental document are necessary.

9.5.8 Alexander Glotov

Jaimie Jones

From: AlexxVita AlexxVita <alexxvita@gmail.com>
Sent: Wednesday, July 13, 2022 9:45 PM
To: Jennifer Guetschow
Subject: [EXT]Comments on Dana Reserve / Canada Ranch development project in Nipomo

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County of San Luis Obispo
Jennifer Guetschow, Senior Planner
jguetschow@co.slo.ca.us

RE: Comments on Dana Reserve / Canada Ranch development project in Nipomo

I have nothing much to add to my comments, which I provided in July 2021 (I was then in Ukraine and corresponded from the territory of Ukraine).
In June-July 2022, I studied new County documents that were made available to the public, as well as lobbying materials that interested parties publish in the media. In this regard, I would like to make a few additional comments.

SOURSE: "The Dana Reserve development plan has secured a piece of land on which they will put a permanent conservation easement. The land has between 10,600 and 14,000 trees. "So, altogether, we will permanently conserving about between 4 and 5 trees for every one that we remove," said Tompkins"
KSBY California Central Coast, June 12,2022

MY COMMENT: If follow the logic of this article in the Internet edition, then the destruction of 288 acres of a unique oak forest with unique habitats on flat terrain next to 101 Freeway (which has no analogues from Los Angeles to Monterrey) is fully compensated by the "permanent conservation" of an another oak forest site in a mountainous area, where no one lives and no one travels, and where nothing threatens nature even without "conservation".
I cannot agree with the above concept.
After all, the initiators of Dana Reserve are not talking about planting new trees or other real. tangible and costly mitigation measures.
They are trying to solve their issue exclusively in a pseudo-legal, "paperwork" way.
In my opinion, this is unacceptable.

AG-1

SOURSE: BIO-7.1: Nesting Bird Preconstruction Survey and Nest Avoidance. Within 1 week prior to ground-disturbing activities, if work occurs between February 1 and September 15, nesting bird surveys shall be conducted… The biologist shall collect data on the birds' baseline behavior and their tolerance to disturbance by observing the birds at the nest prior to construction activities. If the birds are incubating, the biologist shall record how frequently adults deliver food and visit the nest. The biologist shall also record the birds' reaction to the biologist and how close the biologist can get to the nest before the birds' behavior is altered or they show signs of stress or disturbance.

AG-2

1

Dana Reserve Executive Summary Report, Mitigation Measures, Page 21

MY COMMENT: It's funny to read this against the background of plans to destroy a unique natural habitat in 288 acres of oak forest (when it is obvious that the global construction works here will last about 5 years, after which the inhabitants of 1200 dwellings will not leave birds any chance to nest here). The authors of this text probably expected that no one would study this text.

AG-2 (cont'd)

SOURSE: **PROJECT ALTERNATIVES**

Burton Mesa Chaparral Avoidance Alternative. Under this potential alternative, proposed development would be limited to the eastern portion of the project site by increasing the density of proposed single-family residential dwellings, multi-family residential dwellings, and proposed commercial development in the eastern portion of the site and reducing the area of proposed buildout, particularly in sensitive areas of biological resources in the western portion of the Specific Plan Area, including areas supporting Burton Mesa chaparral. While the Burton Mesa Chaparral Avoidance Alternative would substantially avoid and reduce impacts to biological resources and reduce air pollutant and GHG emissions, reduce vehicle miles traveled (VMT), reduce unplanned population growth, and improve project consistency with applicable plans and policies, this alternative would not reduce significant impacts related to aesthetic resources and would potentially increase impacts associated with compatibility with the surrounding areas. Further, this alternative would not meet all of the basic project objectives, such as providing a diversity of housing types, including affordable homes, and connecting on-site residential neighborhoods to the community through development of pedestrian, bicycle, and equestrian trails via Collector B and an on-site trail system in the majority of the Specific Plan Area. The Burton Mesa Chaparral Avoidance Alternative does not meet all of the basic project objectives and is likely infeasible from a cost perspective. It also has the potential to generate more severe and/or new potentially significant impacts; therefore, this alternative was **eliminated from further review**, consistent with State CEQA Guidelines Section 15126.6(c).

Dana Reserve Executive Summary Report, Project Alternatives, Page 67

AG-3

Residential Rural Development Alternative. This alternative would result in a future buildout scenario that is consistent with the existing Residential Rural (RR) land use designation for the project site. While this alternative would result in residential development in a manner that would be more consistent with the scale of adjacent residential land uses and would reduce air pollutant emissions, GHG emissions, VMT, and population growth, the Residential Rural Development Alternative would not meet the basic project objectives related to providing a diversity of housing types, including affordable homes. This alternative also has the potential to increase impacts related to utilities and service systems. Therefore, the Residential Rural Development Alternative **was eliminated from further discussion i**n accordance with State CEQA Guidelines Section 15126.6(c).

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Exclusively Commercial/Retail Development Alternative. Under this alternative, the 288-acre project site would not be developed with residential uses and would instead be developed with flex commercial and village commercial uses over 238.2 acres of the project site. While this alternative would reduce air pollutant emissions, GHG emissions, VMT, and population growth, the Exclusively Retail Development Alternative would not meet the basic project objectives and would be inconsistent with the General Plan. This alternative would not meet project objectives and County objectives (as defined in the County's MOU with the Applicant) related to providing a diversity of housing types, including affordable homes, and providing public parks. This alternative would continue to result in the loss of oak woodland, Burton Mesa chaparral, and other natural habitats and would alter the existing visual character of the project site. This alternative may also be infeasible due to the project

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area's inability to support this significantly increased extent of commercial/retail uses. Since the Exclusively Commercial/Retail Development Alternative would not meet the basic project objectives, if potentially infeasible, and would not reduce all of the project's significant impacts, this alternative **was eliminated from further consideration**, consistent with State CEQA Guidelines Section 15126.6(c).
Dana Reserve Executive Summary Report, Project Alternatives, Pages 67-68

Alternative Location Alternative. Under this alternative, the project would not be developed on the proposed 288-acre Dana Reserve and would be developed at another location within the county. An alternative location would need to be large enough to accommodate approximately 173 acres of residential land uses, including 831 residential single-family units, 458 residential multi-family units, and up to 152 ADUs; 22.3 acres of commercial land uses; 49.8 acres of open space; 21.9 acres of roadways; and 11 acres of public recreational facilities. The applicant does not own alternative sites that could accommodate the proposed development; therefore, it is uncertain whether an alternative site would be feasible, successfully reduce the project's significant impacts, and meet the basic project objectives. Therefore, the Alternative Location Alternative **was eliminated from further discussion** in accordance with State CEQA Guidelines Section 15126.6(c).
Dana Reserve Executive Summary Report, Project Alternatives, Page 67

AG-3 (cont'd)

The State CEQA Guidelines require an analysis of alternatives to identify an environmentally superior alternative among the alternatives evaluated in the EIR. The environmentally superior alternative is the alternative that would minimize adverse impacts to the environment. Based on the evaluation of alternatives, the No Project Alternative would be the environmentally superior alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is also the environmentally superior alternative, the EIR should then identify an environmentally superior alternative among the other alternatives. Based on the detailed evaluation of project alternatives included in EIR Chapter 5, Alternatives Analysis, Alternative 3: the Residential Rural Cluster Subdivision Alternative would be considered the environmentally superior alternative. Since residential development would be central to this alternative, this alternative would help the County reach its housing development allocation goals per the County RHNA required by state law. However, based on the clustered development and other site constraints, this alternative may not meet project goals for the provision of affordable market rate housing units. Therefore, Alternative 3 would reduce the project's significant impacts; however, it would not meet all of the project's objectives. Because it would most successfully reduce the number and extent of significant environmental impacts, and would meet more of the project's primary objectives than other alternatives, Alternative 3 is the Environmentally Superior Alternative.
Dana Reserve Executive Summary Report, Project Alternatives, Page 67

MY COMMENT: The language used in the above parts of the Executive Summary reflects the desire to comply with the rules. But the rules themselves are ambiguous and difficult to understand, as illustrated by the accompanying text **Cal. Code Regs. tit. 14 § 15126.6** (See Exhibit A below). Different judges may interpret these rules in different ways.
It is clear to me that based on the unilaterally interpreted State CEQA Guidelines Section 15126.6(c), the County has decided to reject all alternatives (for example, to force Dana Reserve to downsize development and limit it to parts of the site where there are no oaks; or find another location for 1200 dwellings where there are no ancient oaks). In pursuance of such an intention, the County determined that all alternatives were «eliminated from further review», «eliminated from further discussion», «eliminated from further consideration».

AG-4

The Executive Summary Report contains the emphasis on how this project will help increase the number of housing for workforce and affordable housing in the County and overcome the housing crisis. Unfortunately, this

AG-5

argument is questionable under the circumstances. The fact is that in some cities such as Los Osos and Cambria, there are hundreds of empty plots of land due to the moratorium announced by the County on new construction. The reason for the moratorium is the shortage of water resources. If the County wants to overcome the housing crisis, then it is not necessary to destroy the unique oak forest in Nipomo. It is possible to lift the moratorium on the North of the County and thereby significantly relieve tension in the housing market. As for the water issue, if it turns out there is enough water for the new 1200 dwelling units in Dana Reserve, then there should be enough water for thousands of other houses that the residents of the County are now unable to build due to the moratorium announced by the County. There is a clear inconsistency here. AG-5 (cont'd)

Another alternative is to designate another site for such a massive project. In my previous comments, I suggested to pay attention to several alternative sites that were sold at very reasonable prices. But there was no response to my suggestion to consider an alternative. And now there are several large areas without vegetation on the real estate market of San Luis Obispo County. Of course, these areas will have to be planted and money will be spent on this. It is clear that it is much easier to build a new village for profit in an already existing oak forest, which is hundreds of years old. But I can't agree with this logic. AG-6

CONCLUSION:

I don't want to look like an opponent of progress. I understand that the County wants new development. That is why, in my comments in July 2021, I proposed to the County an alternative site plan for Dana Reserve, which provided for the construction of a sufficient number of new houses in places where there are no oaks. This plan (diagram) has been carefully crafted and provided to the County. Unfortunately, I did not receive an answer. AG-7

It is obvious that a powerful train is moving forward and it is impossible to stop it or at least partially change the direction of its movement.

I can't stop this train by filing grievances.

But the proposed Dana Reserve project affects not only the interests of the population of Nipomo, but also my personal interests.

I am the only developer in the area of operation of Dana Reserve (although I am a developer of very small scale). All the rest here are just residents, owners of houses.

They have no business intentions while I have planned a new small real estate development here, Villa Victoria Estates.

I am also building a large home on my parcel which is consistent with future subdivision. AG-8

I invested all my money into this subdivision/construction project.

I had a certain vision for the project; counting on the view to the oak forest from my site (I could not believe that in modern California someone would come up with the idea to destroy this unique oak forest).

Dana Reserve and the County ruin my plans.

Therefore, I ask you to attach my comments to the Dana Reserve (Canada Ranch) project review documentation.

I reserve the right to defend my rights and interests by legal methods.

Once again I propose to reduce the appetites of Dana Reserve and force them to reduce the amount of development and only build where there are no oak trees (see my alternative site plan below, which I submitted first in July 2021).

Even in this scenario, the project will be sufficiently profitable for its owners/lobbyists.

Everyone will benefit from such a decision, the nature of California, the County, the population of Nipomo, and the tens of millions of people who drive along Freeway 101. AG-9

Please see below Dana Reserve's plan and my alternative plan in comparison.

Plan proposed by developer

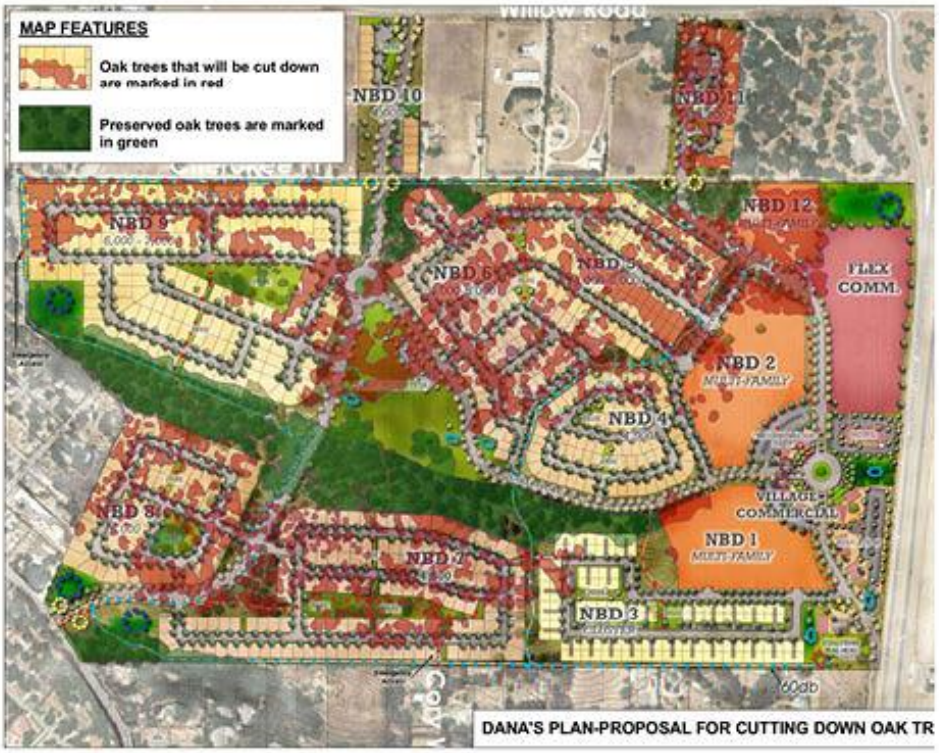
4



AG-9
(cont'd)

The impact of implementation of the plan proposed by developer

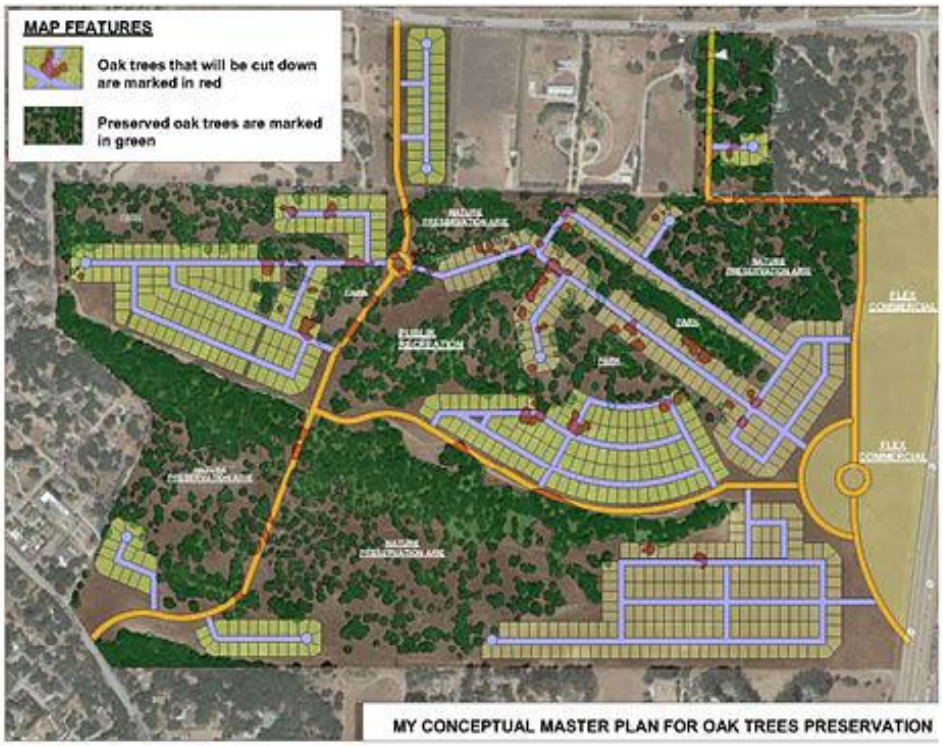
5



AG-9
(cont'd)

My alternative plan

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AG-9
(cont'd)

Sincerely yours
Alexander Glotov
Owner of parcel of land at 750 Sandydale Dr., Nipomo, CA

July 12, 2022

1344 N. Martel Ave., Apt. 302
Los Angeles, CA 90046
(323) 447-2191
alexxvita@gmail.com

EXHIBIT A

Cal. Code Regs. tit. 14 § 15126.6

Section 15126.6 - Consideration and Discussion of Alternatives to the Proposed Project
(a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a

AG-10

7

reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (Citizens of Goleta Valley v. Board of Supervisors(1990) 52 Cal.3d 553 andLaurel Heights Improvement Association v. Regents of the University of California(1988) 47 Cal.3d 376).

(b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.**(c)** Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles(1981) 124 Cal.App.3d 1).**(e)** "No project" alternative.

(1) The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).

(2) The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

(3) A discussion of the "no project" alternative will usually proceed along one of two lines:

(A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

(B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of

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AG-10
(cont'd)

the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

(C) After defining the no project alternative using one of these approaches, the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

(f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors(1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood(1992) 9 Cal.App.4th 1745, 1753, fn 1).**(2)** Alternative locations.

(A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

AG-10
(cont'd)

(C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 573).**(3)** An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (Residents Ad Hoc Stadium Committee v. Board of Trustees(1979) 89 Cal. App.3d 274).

Cal. Code Regs. Tit. 14, § 15126.6

Note: Authority cited: Section 21083, Public Resources Code. Reference: Sections 21002,21002.1, 21003 and 21100, Public Resources Code; Citizens of Goleta Valley v. Board of Supervisors, (1990) 52 Cal.3d 553; Laurel Heights Improvement Association v. Regents of the University of California,(1988) 47 Cal.3d 376; Gentry v. City of Murrieta(1995) 36 Cal.App.4th 1359; and Laurel Heights Improvement Association v. Regents of the University of California(1993) 6 Cal.4th 1112.

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9.5.8.1 Response to Letter from Alexander Glotov

Comment No.	Response
AG-1	This comment expresses concern of the loss of oak trees at the project site and also asserts that the off-site mitigation area is not located in an area that would provide public access to preserved areas. Refer to MR-3 and JK-4, which responds to this comment.
AG-2	This comment raises concern over the loss of nesting bird habitat at the project site and asserts that Mitigation Measure BIO/mm-7.1 does not adequately address impacts related to the loss of this habitat. As discussed in Section 4.4, *Biological Resources*, of the EIR, special-status birds and raptors, such as Cooper's hawk, oak titmouse, white-tailed kite, and Nuttall's woodpecker, may be adversely affected by the loss of nesting and foraging habitat in oak and chaparral habitats. Loss of grassland habitat could adversely affect foraging raptors and ground nesting birds. Incremental habitat loss on a regional scale may adversely affect special-status birds. Mitigation Measures BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4 have been identified to provide off-site nesting and foraging habitat and reduce impacts related to habitat loss for nesting birds. Mitigation Measures BIO/mm-7.1, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4 adequately address impacts to nesting birds and associated habitat. Therefore, no changes in the environmental document are necessary. Refer to MR-3, which provides a detailed response related to loss of oak trees and other impacts to biological resources.
AG-3	This comment highlights language used throughout Chapter 5, *Alternative Analysis*, of the DRSP EIR. Refer to AG-4, below, which responds to comments related to the alternatives analysis process. A total of six project alternatives (including the No Project Alternative) were evaluated in Chapter 5, *Alternatives Analysis*, of the EIR: • No Project Alternative: Under the No Project Alternative, implementation of the DRSP would not occur and future buildout of the project site, including off-site improvement areas, would not occur. This alternative assumes no development would occur on the site to provide a clear comparison of the project to existing (undeveloped) baseline conditions; development as envisioned in the current General Plan for La Cañada Ranch is evaluated in Alternative 2, below. As no physical changes to the environment would occur, potentially significant and other identified impacts would be reduced in comparison to the proposed project. However, this alternative would not meet any of the project objectives. • Applicant Preferred Alternative (Alternative 1): Under Alternative 1, buildout of the project site would be consistent with the scale and proposed land use types included under the proposed project. As a result, impacts under this alternative would be generally consistent with impacts associated with the proposed project. However, this alternative would change the alignment of Collector A and would move a proposed neighborhood from the northeastern portion of the site, which would substantially reduce the number of impacted oak trees. Alternative 1 would meet all of the project objectives. • La Cañada Ranch Specific Plan (Alternative 2): Under Alternative 2, buildout of the project site would result in an increase in light industrial and commercial development and a decrease in residential development. This alternative would also substantially increase the amount of land designated for open space and eliminate recreational land uses. As a result, impacts related to air quality, GHG emissions, population and housing, and transportation would be reduced. However, this alternative would result in similar impacts related to biological resources and would increase impacts related to recreation. Although this alternative would facilitate the future development of residential land uses, due to the substantial reduction in the number of proposed units, the number of affordable units and affordability of market rate units would be significantly decreased in order to provide funding for site development and other improvements. As a result, Alternative 2 would not meet some of the basic project objectives, including providing a mix of residential development, including affordable homes, and providing public recreational facilities at the project site. • Residential Rural Cluster Subdivision (Alternative 3): Under Alternative 3, no commercial development would occur, and the density of residential development would be limited, resulting in a smaller scale of buildout as compared to the proposed project. Based on the reduction of proposed residential units, this alternative would reduce population growth in comparison to the proposed project. As a result, impacts related to aesthetics, air quality, GHG emissions, population and housing, and transportation would be reduced. However, this alternative could continue to potentially impact sensitive biological resources. In addition, this alternative may preclude annexation into the NCSD due to infrastructure costs; therefore, this alternative would potentially increase impacts related to utilities and service systems. Due to the substantial reduction in the number of proposed residential units, the number of affordable units would be significantly decreased in order to provide funding for site development and other improvements. As a result, Alternative 3 would not meet the basic project objective of providing affordable workforce market rate homes. In addition, this alternative would be inconsistent with the commercial and light industrial land uses planned for the site as identified in the County's General Plan. This alternative was selected as the Environmentally Superior Alternative.

Comment No.	Response
	• Development on Non-Native Grassland (Alternative 4): Alternative 4 would increase the amount of land dedicated to open space by increasing density and reducing the footprint of proposed residential, commercial, and recreational development. As a result, the number of residential dwelling units would be reduced from 1,289 units to 1,100 units (approximately 189 units or 15%). In addition, the land dedicated to commercial land uses would be reduced by 2.3 acres and the land dedicated to recreational land uses would be reduced by 6 acres, ultimately increasing the amount of open space area on the site and reducing the amount of impacted oak woodland and Burton Mesa chaparral habitat. This alternative would marginally reduce population growth in comparison to the proposed project. However, buildout of this alternative would still constitute a substantial increase in growth within the community, and impacts related to air quality, GHG emissions, population and housing, and transportation would be generally consistent with the proposed project. This alternative is considered feasible; however, it may conflict with the basic project objective of providing a mix of housing types and affordable housing options. • Gradual Transition along the Fringe (Alternative 5): Under Alternative 5, the density of residential development would be reduced along the perimeter of the project site to support a more gradual transition from surrounding rural residential land uses. Based on the slight reduction of proposed residential units (approximately 154 units or 12%), this alternative would marginally reduce population growth in comparison to the proposed project. However, buildout of this alternative would still constitute a substantial increase in growth within the community and impacts related to air quality, biological resources, greenhouse gas emissions, land use and planning, population and housing, and transportation would be generally consistent with the proposed project. This alternative is considered feasible; however, it will likely reduce the affordability of housing within the Specific Plan Area and may conflict with the basic project objective of providing a mix of affordable housing options. This comment does not assert any new information regarding the alternatives analysis; therefore, this comment does not identify any deficiency in the EIR and no changes in the environmental document are needed.
AG-4	This comment expresses concern over the ambiguity of State CEQA Guidelines Section 15126.6(c). As described in Chapter 5, *Alternatives Analysis*, State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts. The DRSP EIR evaluated four alternatives in Section 5.3, *Alternatives Considered but Discarded*, that were ultimately eliminated from further consideration based on the above criteria. Additionally, six alternatives (refer to AG-3) were fully evaluated in accordance with State CEQA Guidelines Section 15126.6, which states that alternatives should ". . . attain most of the basic objectives of the project . . ." As further explained by the California Supreme Court: > [A]n EIR should not exclude an alternative from detailed consideration merely because it 'would impede to some degree the attainment of the project objectives.' But an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonably determined cannot achieve the project's underlying fundamental purpose . . . > Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal." (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings, 43 Cal.4th 1143, 1165-1166 [2008]). The alternatives selected for further analysis have been evaluated against the proposed DRSP project to provide a comparison of environmental effects and to identify the environmentally superior alternative. Note that the significance of impacts associated with the proposed project, and the determination of impacts presented in this section for comparative purposes, are based on the respective identified changes in conditions relative to the environmental baseline (as described in Chapter 4, *Environmental Impacts Analysis*). The County has the discretion to approve (or disapprove) whatever alternative or combination of alternatives it deems most appropriate, provided that the environmental impacts of the proposed project can be mitigated, or to the extent that they cannot, provided that the County adopts a Statement of Overriding Considerations, per Section 15093 of the State CEQA Guidelines. The DRSP EIR contains an evaluation of project alternatives in accordance with the State CEQA Guidelines, noted above. As such, this comment does not require any changes to the environmental document.

Comment No.	Response
AG-5	This comment asserts that the housing crisis in the county can be resolved through development in other areas such as Los Osos and Cambria, which have hundreds of empty lots; however, development is halted due to water shortage. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project. The EIR evaluates the availability and reliability of the NCSD water supply, which would provide water for the project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to the NCSD water supply. Therefore, the project would be provided water by the NCSD, which has adequate available supply to serve its existing service area in addition to the proposed project. This comment does not require any changes to the environmental document. Refer also to Master Response MR-3.
AG-6	This comment asserts that an alternative location for the project should be explored. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project.
AG-7	This comment suggests an alternative location for the project, which would reduce the project's impacts to oak trees. The Alternative Location alternative was explored in Chapter 5, *Alternatives Analysis*, of the EIR. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project. Additionally, refer to MR-3 and AG-3, which identifies the alternatives explored for this project, including alternatives intended to reduce impacts to oak trees.
AG-8	This comment requests that these comments are attached to the environmental documentation. As such, this comment does not require any changes to the environmental document. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
AG-9	This comment suggests an alternative layout for the proposed development to avoid impacts to oak trees and asserts that this alternative would be beneficial to state and local entities. Refer to MR-3 and AG-3, which responds to comments regarding project alternatives, including an alternative layout intended to avoid oak trees.
AG-10	This comment includes the text of State CEQA Guidelines Section 15126.6 and calls out the need to explore an alternative location for the proposed project. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project.

9.5.9 Stacy

[EXT]Dana Reserve project

Katherine E <katherineanddogs@gmail.com>
Wed 7/13/2022 6:06 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

It's depressing to even read about this project.
I currently live in San Luis Obispo. It took 20 years to get here. Saving money and working hard. Now that I've moved to this county, I'm worried about the growth.
Please don't change the landscape all over this county.
Please don't allow them to cut down all those trees.
Please don't allow this area to keep building like this.
I firmly oppose.

St-1

Stacy
661-900-2059

9.5.9.1 Response to Letter from Stacy

Comment No.	Response
St-1	This comment raises concerns related to population growth, loss of oak trees, and the change in landscape within the county and states this commenter's opposition to the project. Refer to MR-3 and JK-4, which addresses comments regarding the loss of oak trees and the change to the visual character of the project site. In addition, Section 14, *Population and Housing*, of the DRSP EIR concluded that an increase of 4,286 new people within the community would result in a Class I impact; therefore, concern related to substantial population growth expressed in this comment is consistent with the evaluation included in the DRSP EIR. No changes in the environmental document are necessary.

9.5.10 BC Prewett

[EXT]Dana reserve project

bcprewett@gmail.com <bcprewett@gmail.com>
Thu 7/14/2022 9:06 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Over building Nipomo has shown to be a detriment to our community. I have lived in Nipomo for 30 years, and seen it go from a quaint town to a overbuilt congested cluster of bland name brand stores. If this is being planned by the same people who were responsible for the approval of the new shopping center on the old Rec Center site, than the new Dana Reserve project should be terminated immediately. Stop destroying Nipomo, stop destroying our community, this big city mindset has to end before Nipomo is ruined forever.
We lost our small town grocery store, we lost our local coffee shop, we lost our frontage road, we lost our ability to drive across town without traffic, we lost our town. Please end this over building, before it is impossible to still love Nipomo.

BCP-1

9.5.10.1 Response to Letter from BC Prewett

Comment No.	Response
BCP-1	This comment expresses concern over the loss of community within Nipomo, increased traffic congestion, and loss of local businesses as a result of increasing development projects. Refer to JK-6 and JK-7, which responds to comments regarding traffic congestion, hazards, and transportation improvements. In addition, economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. The comment does not include any specific facts or information that would indicate any deficiency in the EIR; therefore, no changes in the environmental document are necessary.

9.5.11 Beth Ralston

[EXT]Dana Reserve Project

Beth Ralston <mesagirl@verizon.net>
Thu 7/14/2022 4:01 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I just finished listening to the Zoom presentation.

I have quite a few concerns that I want to voice. Please bare with me here :) This won't be short lol

- The impact on the wildlife, which I don't believe was addressed, I fear will be very destructive. Removing 4,000 mature oak trees seems crazy to me. We love our oak trees. They provide habitats to many different animals, including our amazing raptors. Here is a link to a short 4 minute video where a docent explains why Oak Trees are so important for our wildlife. https://www.youtube.com/watch?v=iYP-RXqbvm0

Coyotes, deer, squirrels, opossums, skunks, raccoons are just a few of the animals that will be impacted. Now add to that all of the birds that will be impacted with the removal of the trees where they nest.

I don't agree with the idea that we should be pushing out wildlife for humans. We've already done that in Nipomo and we are already feeling the detriment of the removal of all of the Eucalyptus trees for the building of Trilogy. Plus people know want to kill the wildlife that is trying to maintain an existence here because those that move here find them to be a nuisance. Won't the same thing happen here? BR-1

- Population problems. This will increase our population quickly! 1300 homes, some of which are multi family!! If you go best case scenario there will be say 5 people per household. That would be 6500 more people into an already badly impacted area. Tefft is a nightmare still, we have 1 grocery store, 3 gas stations, 2 pharmacies, and of course no real sheriff station and 1 fire station. This just seems way too large of a project for Nipomo to handle (or want). BR-2

- It won't match the rural area we all moved here for. A lot of people here moved from So Cal to get away from exactly what seems to be projected. Tightly packed cookie cutter homes. I highly suggest lowering the number of homes, and increasing the property per house. I left an area where we were on about 1/4 or so of an acre. I think to match the homes that surround it, the homes should be situated on 1/2 acres lots. BR-3

- Water water water!!! Severe drought doesn't seem like building something of this magnitude is smart. BR-4

- Traffic - obviously this will increase traffic locally and as I already stated, we are struggling already with our current population. BR-5

- Schools - our schools are already heavily full. Are you planning on building a new Elementary School? Middle School? High School? We honestly do not have the funds now to support our school kids. My son grew up here and went through the local public schools from Nipomo Elementary through NHS. Nipomo High School especially was lacking in classes for the kids. All of his classes all through his education were very full. Adding a large group of children to this area again, doesn't seem smart. BR-6

I really could go on and on.

What it basically comes down to is, I think that this project is way to large for Nipomo to handle currently (or ever honestly). Way too dense for certain. Will have negative impacts on the local wildlife and losing all of those Oak Trees seems unconscionable. BR-7

I would cut the housing at least by half, put them on larger lots, and hopefully have all of them equipped with solar energy.

It would be nice to keep our "small town feel" , provide homes for families for sure. But this IMHO should be done on a much smaller scale housing wise. Work around the trees! Work around the wildlife! Not the other way around. BR-8

Thanks so much for taking the time to read through my concerns.

Beth Ralston
Resident here since 1998

9.5.11.1 Response to Letter from Beth Ralston

Comment No.	Response
BR-1	This comment raises concern over impacts to biological resources, including oak trees, native habitats, raptors, and common wildlife species. Refer to MR-3 and AG-2, which responds to comments related to loss of oak trees and impacts to other biological resources. As evaluated in Section 4.4, *Biological Resources*, the project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. The applicant would be required to mitigate for the loss of California spineflower, sand buck brush, and sand almond at a 1:1 mitigation ratio in BIO/mm-4.1. However, it is reasonable to assume that a portion of replanted plants would not successfully establish, and therefore would constitute a net loss for these species. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed from habitats other than oak woodland and oak forest. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the County. As such, this issue area was classified as a Class I impact, which is consistent with the intent of this comment. Special-status birds and raptors, such as Cooper's hawk, oak titmouse, white-tailed kite, and Nuttall's woodpecker, may be adversely affected by the loss of nesting and foraging habitat in oak and chaparral habitats. Loss of grassland habitat could adversely affect foraging raptors and ground nesting birds. Incremental habitat loss on a regional scale may adversely affect special-status birds. Mitigation Measure BIO/mm-7.1 has been identified to reduce impacts to special-status birds and raptors. Further, the loss of approximately 93% of available habitat on the property will adversely affect American badger, woodrat, sensitive bat species, and numerous common species, such as coyote (*Canis latrans*), black-tailed jackrabbit (*Lepus californicus*), and California ground squirrel through loss of available denning/roosting sites, reduction in prey base, loss of protective cover, predation by domestic animals (dogs and cats), increased vehicle traffic, and increased nighttime lighting and noise. Mitigation Measures BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4 have been included to address these impacts. This comment is consistent with the evaluation of the EIR; therefore, no changes to the environmental document are necessary.
BR-2	This comment expresses concern related to the population growth within the community of Nipomo. As evaluated in Section 4.14, *Population and Housing*, of the DRSP EIR, implementation of the project would allow for the future construction of 831 single-family dwelling units, 458 multi-family dwelling units, and 152 ADUs. According to the U.S. Census Bureau, the average household size in Nipomo between 2015 and 2019 was 3.16. Based on the average local household size in Nipomo, future buildout of DRSP residential land uses is anticipated to result in a residential population increase of approximately 4,555. In addition to proposed residential land uses, the DRSP would allow for the future phased development of village commercial and flex commercial uses, which would generate new jobs. Based on Table 1A in the SCAG *Employment Density Study Summary Report*, the project would generate approximately 273 new employees. Therefore, the proposed project has the potential to facilitate a population growth of 4,828. The EIR identified that this level of growth would further affect the jobs-to-housing balance within the community. As such, this section of the EIR concluded that an increase of 4,286 new people within the community would result in a Class I impact related to population and housing growth; therefore, concern related to substantial population growth expressed in this comment is consistent with the evaluation included in the DRSP EIR. No changes in the environmental document are necessary.
BR-3	This comment suggests a reduction in the number of proposed residential uses and asserts that new homes should be situated on 0.5-acre lots. A range of project alternatives were evaluated in Chapter 5, *Alternatives Analysis,* including the Residential Rural Cluster Subdivision alternative (Alternative 3), which evaluates a future buildout scenario that is consistent with a cluster subdivision of the Residential Rural (RR) land use designation for the project site. Refer to AG-3, which responds to comments related to alternatives explored for the proposed project.
BR-4	This comment raises concern over the availability of water supply to serve the existing population and the proposed project during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments regarding the reliability of the NCSD water supply to serve the existing and projected populations during normal, single-dry, and multiple dry year conditions.
BR-5	This comment raises concern over the project's impact on existing traffic congestion issues within the community. Refer to JK-6 and JK-7, which responds to comments regarding traffic congestion and transportation improvements.
BR-6	This comment raises concern regarding the capacity of the Lucia Mar Unified School District (LMUSD) to serve the growth of school-aged children. As evaluated in Section 15, *Public Services*, although the project would increase the number of school-aged children in the community, the project would be subject to the payment of state taxes for public schools established by the Leroy F. Greene School Facilities Act and implemented by California Education Code Section 17620. As identified in California Government Code Section 65995(h), the payment of mandatory school development impact fees (through County Public Facilities Fees) ". . . is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The comment does not include any specific

Comment No.	Response
	facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact; therefore, no changes in the environmental document are necessary.
BR-7	This comment expresses concern regarding the density of the proposed project and the loss of trees and local wildlife as a result of the development. Refer to MR-3, JK-4, and BR-1, which addresses this comment.
BR-8	This comment suggests preserving the community's "small town feel" by reducing the number of homes and avoiding oak trees and wildlife and also suggests the use of solar. Refer to BR-3 and AG-3, which responds to project impacts related to a reduction in the number of homes associated with the proposed project and to AG-3 and JK-5, which responds to comments regarding an alternative site layout intended to reduce impacts to native habitat types. Refer to MR-3, which addresses comments related to the loss of oaks at the project site. As evaluated in Section 4.6, Energy, of the EIR, Proposed single-family residential dwellings would also be required to incorporate solar PV systems, per current building code requirements. Therefore, no changes to the environmental document are need.

9.5.12 Danna Weidner

Danna M. Weidner & Thomas L. Cash
1551 Cielo Lane
Nipomo, California 93444

July 14, 2022

Response to EIR on Dana Reserve Project in Nipomo
File # LPR 2020-00007

My husband and I have been residents of Nipomo for almost 5 years. After living in two other areas of SLO county we settled on Nipomo primarily because of its rural character. I have reviewed the EIR and have several concerns about this project.

I use the Willow Street exit off the 101 almost exclusively to avoid heavier traffic on Tefft. Adding a development of 1,289 homes will have a substantial impact on traffic both getting on and off the freeway and then on Willow itself. Because of the traffic impact, there will also be an increase in automobile emissions. DMW-1

I am very concerned about the increased water usage this project would cause. Our water is already rationed (watering only 2 days/week) causing most folks to give up landscaping altogether. Our water rates are also already high. Adding 1,289 additional users will have a significant impact—forcing us to find additional sources of water and having rates climb even higher. As retired seniors who have rain collection barrels, only shower every other day and reuse every drop of interior water, we are unwilling and actually unable to do much more especially in the way of money. DMW-2

We love our area and its plant and animal life. Cutting down hundreds of mature live oak trees and the resultant habitats they provide is unconscionable. Even replanting with a 4:1 ration is not an answer. Young trees require lots of regular watering and some, despite even good care, will not survive. In addition, reptiles, bees and raptors, to name a few, will be displaced and need to find new homes. Also, the winds will lose a barrier (like when Trilogy cut all there trees down and caused an increased dust problem) which will no doubt increase dust in our air and further degrade air quality. DMW-3

I commend the planning department in a very thorough study; however, quality of life in our county is surely giving way to increased population. If we as residents wanted to live in a congested area with traffic issues, we would have stayed in our previous communities. I believe one large housing development (such as Trilogy) is enough for our small community. DMW-4

I sincerely appreciate your consideration.

Danna M. Weidner

Danna M. Weidner

9.5.12.1 Response to Letter from Danna Weidner

Comment No.	Response
DMW-1	This comment raises concern regarding an increase in traffic congestion along Willow Road and associated vehicle emissions from an increase in vehicle congestion. The project includes improvements to Willow Road, including the widening of Willow Road and signalization at the Willow Road/Collector A intersection within existing right-of-way (ROW) areas, which be completed as part of the first phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 1, 2, 3, 5, and 10) and the village commercial, flex commercial, and educational uses. Additional improvements include restriping and implementation of a one-way stop-control at the Willow Road/Collector B intersection within existing ROW areas, which would be completed as part of the second phase of development and prior to certificate of occupancy for the residential uses (i.e., Neighborhoods 7, 8, and 9). As evaluated in the TIS prepared for the proposed project, proposed improvements would ensure implementation of the project does not increase vehicle congestion in these areas. Additionally, implementation of the project would reduce vehicle congestion along other roadways within the community, as discussed in JK-6 and JK-7. Further, a Class I impact related to an increase in VMT, and associated emissions was identified in the EIR, which is consistent with the intent of this comment. As such, no changes in the environmental document are necessary.
DMW-2	This comment raises concern over the availability of water supply to serve the existing community in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which addresses comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DMW-3	This comment raises concern over the loss of oak trees and associated wildlife habitat at the project site and the potential to increase dust due to a reduced wind barrier created by the trees. Refer to MR-3, JK-4, and BR-1, which addresses comments related to the project's impacts related to the loss of oak trees, habitat loss, and wildlife. In addition, air quality modelling conducted for the proposed project takes wind speed, direction, and loss of existing vegetation into consideration in determining project impacts related to long-term air emissions. The EIR includes the results of the air quality modelling conducted for the project, which did not identify a long-term impact related to dust emissions. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact; therefore, no changes in the environmental document are necessary.
DMW-4	This comment raises concerns, including an increase in population and traffic congestion, and suggests that an additional large housing project in the community is not necessary. Refer to BR-2, which addresses the project's impacts related to an increase in population and JK-6, JK-7, and DMW-1, which addresses comments related to traffic congestion.

9.5.13 Dan Doberstein

[EXT]Dana Reserve Project

dan doberstein <dandober@yahoo.com>

Sat 7/16/2022 12:57 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

My wife and I have lived near this proposed project since 1996. It used be quite here. No more. We used not worry about water. No more. As I understand this project they will be adding thousands of residences?? Where is that water coming from? This is a real bad idea and should be refused/rejected. **DaDo-1**

Nipomo needs to go slow on growth...its already up by nearly 10 fold since we moved here. SLO BOS needs to stop pushing things they dont want in SLO city area (like high density housing) on south county. **DaDo-2**

Dan Doberstein

Nipomo

9.5.13.1 Response to Letter from Dan Doberstein

Comment No.	Response
DaDo-1	This comment raises concern over the population growth and availability of water supply for the existing community in addition to the proposed project. Refer to BR-2, which addresses the project's impacts related to an increase in population and MR-1 and GRe-1 through GRe-4, which addresses comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DaDo-2	This comment asserts that the County Board of Supervisors (BOS) should cease large development in the South County area. Refer to BR-2, which addresses the project's impacts related to an increase in population. Ultimately, it will be the decision of the lead agency's decision-making body whether or not to reject or approve the proposed project or an alternative.

9.5.14 Deanna Talerico

[EXT]Dana Reserve Public Comment

Deanna T <scdeannad@hotmail.com>
Sat 7/16/2022 8:07 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello,

As an Arroyo Grande resident and a nearby neighbor (off Summit Station Road) to the proposed project site, I am writing today to express my concern and **strong opposition** to the Dana Reserve Project. This area is beautiful, peaceful, and home to abundant native wildlife. Our area also already struggles with air pollution, habitat loss, and adequate water supply. A project with such dense infill, high population and housing, and the increased traffic, noise, light pollution, and demand on resources it would bring does not belong here among our mostly open land and large (but sparsely developed) parcels. Given what is proposed, using the name "Reserve" is deceiving and conniving. DT-1

By looking over the EIR, it is obvious the project manager and those involved already know this. The proposed project would cause "significant impacts" to nearly every single environmental category or concern on the checklist: aesthetics, air quality, sensitive habitat, special-status animals and protected oaks, water resources, and is in conflict with state and/or local renewable energy, emergency response, and sustainable groundwater management plans. The negative impacts it would make would be **detrimental and permanent,** and are not able to be adequately mitigated. I urge you to look at all these factors and conclude that this project is **not suitable for the proposed site.** DT-2

Thank you very much for your concern and time.

Deanna Talerico

9.5.14.1 Response to Letter from Deanna Talerico

Comment No.	Response
DT-1	This comment expresses opposition to the proposed project and raises concerns, including native wildlife, habitat loss, air pollution, water supply, traffic congestion, noise, light pollution, and demand on existing resources. Refer to MR-3, BR-1, and JK-4, which responds to comments related to native wildlife and habitat loss; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and JK-6 and JK-7, which responds to comments related to traffic congestion and implementation of improvements. As evaluated in Section 4.1, *Aesthetics*, DRSP Design Guidelines include standards that address commercial, residential, and nonresidential outdoor lighting. The DRSP requires all lighting design and fixtures to be "dark-sky" compliant, consistent with the International Dark-Sky Association and/or County requirements. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. As evaluated in Section 4.15, *Public Services*, the project would be subject to the payment of fees to provide funding for maintenance of existing facilities and development of additional facilities. In addition, Mitigation Measure PS/mm-1.1 requires the applicant to set aside land to provide a location for future development of a new CAL FIRE station in the community. Concerns related to light pollution, noise, and public services have been addressed in the EIR and mitigation has been included where appropriate to address potential impacts. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. In addition, the EIR identifies a Class I impact related to air quality emissions, which is consistent with the intent of this comment. Therefore, no changes to the environmental document are needed.
DT-2	This comment notes the project's significant and unavoidable impacts and inconsistencies with applicable planning documents. This comment is consistent with the evaluation included throughout the EIR. The County has the discretion to approve (or disapprove) the proposed project based on these factors, which are called out in the EIR. Therefore, no changes to the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.15 Pam Howard

[EXT]Dana Reserve Project

howardsnest@frontiernet.net <howardsnest@frontiernet.net>

Tue 7/19/2022 8:46 AM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I do LOVE the way the area is currently undeveloped. I love driving by on the freeway and see the cattle roaming and the beautiful oak trees. I do hope out city does not turn out to be like a lot of the beach cities in southern California. These are a few concerns I have about the project, seeing I am a resident in Nipomo: PH-1

How will this impact our schools? PH-2

How will it impact our water storage? PH-3

Can our sewer plant handle this large quantity of waste? PH-4

How will our streets and intersections handle the large amount of traffic? PH-5

I understand they will remove the old oak trees with smaller trees, how will this look? PH-6

How can our sheriff's handle the increase of population as they can not handle what they have now? PH-7

The post office can not handle what we have now and the parking lot is a disaster, what will happen with more people? PH-8

Nipomo is currently unincorporated, with this much population would the city now need to incorporate? PH-9

Will the design of the project be better than what is currently done on Tefft street, putting in center dividers with weeds? PH-10

The other side of the freeway does not have the beautiful oak trees, why not build there? PH-11

When our family comes to visit from the beach area in southern California, they always comment on the open land and how refreshing it is. I know progress has to take place but I think in this instance not all the research has been done on how that particular area will impact our little city, which is a jewel. Also with natural resources being strained, is this the right time for this project? PLEASE take a moment and reconsider this project. PH-12

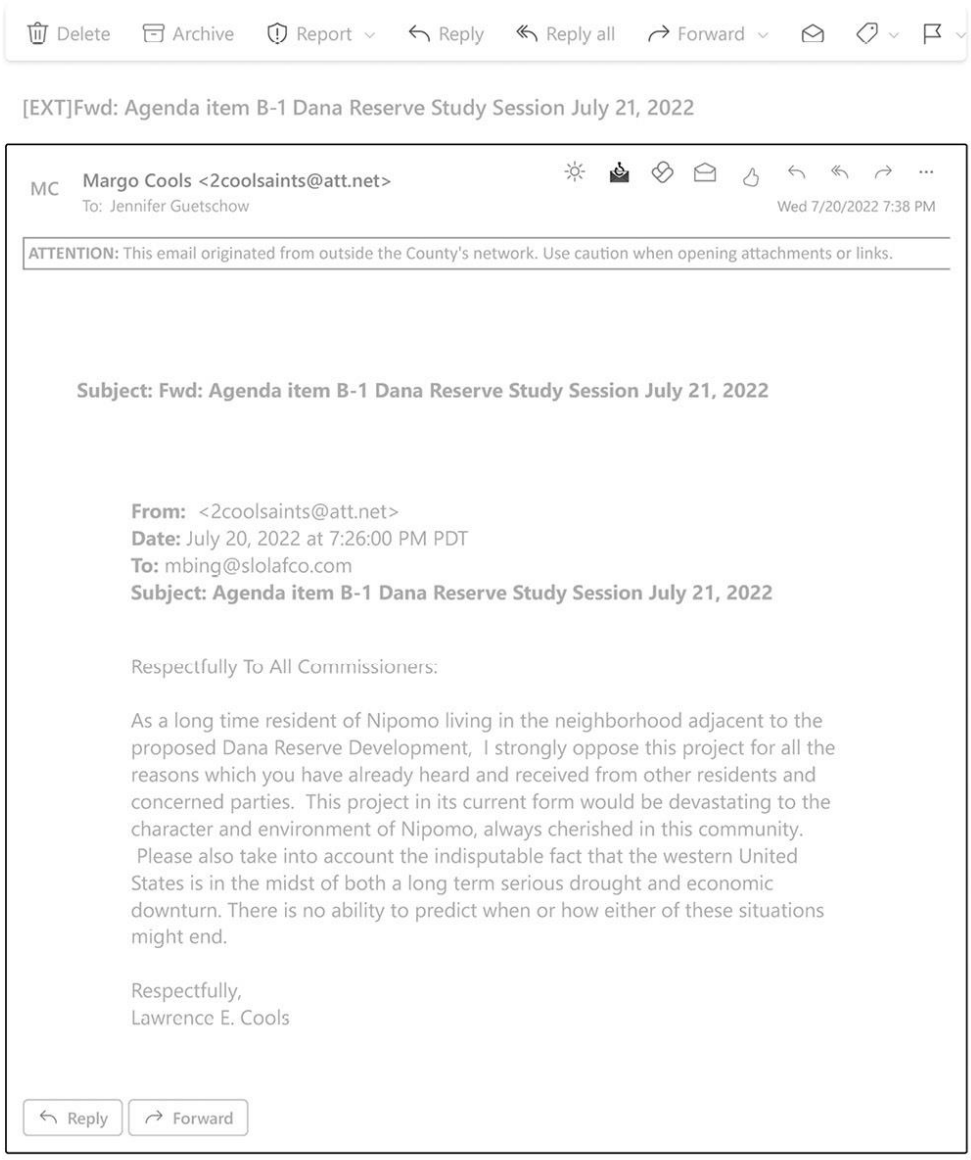
Pam Howard
210 Brunos Ct.
Nipomo, ca. 93444

9.5.15.1 Response to Letter from Pam Howard

Comment No.	Response
PH-1	This comment expresses concerns related to the project's impacts related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to BR-2, which addresses comments related to housing and population growth. As evaluated in Section 4.1, *Aesthetics*, DRSP Design Guidelines include standards that address commercial, residential, and nonresidential outdoor lighting. The DRSP requires all lighting design and fixtures to be "dark-sky" compliant, consistent with the International Dark-Sky Association and/or County requirements. As evaluated in Section 4.13, *Noise*, a Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. Additionally, as evaluated in Section 1, *Aesthetics*, of the DRSP EIR, implementation of the project would alter the existing visual character of the rural project area and was also classified as a Class I impact. As such, concern related to the alteration of the visual character of the project site is consistent with the evaluation included in the DRSP EIR; therefore, no changes in the environmental document are needed.
PH-2	This comment raises concern regarding the capacity of the Lucia Mar Unified School District (LMUSD) to serve the growth of school-aged children. Refer to BR-6, which addresses comments related to public schools.
PH-3	This comment expresses concern related to the reliability of water supply. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to the availability during normal, single-dry, and multiple-dry year conditions.
PH-4	This comment expresses concern over the ability ~~for~~of the Southland WWTP to treat an increase in wastewater. The project includes the implementation of off-site water and wastewater improvements that were identified by the NCSD in the *Dana Reserve Water and Wastewater Service Evaluation* as necessary to serve the existing service area in addition to the proposed project. These are described in Chapter 2, *Project Description*, and Section 4.19, *Utilities and Service Systems* of the EIR. As evaluated in Section 4.19, *Utilities and Service Systems* of the EIR, implementation of these improvements would ensure the NCSD would have adequate capacity to treat future wastewater flows from the proposed project and projected growth within the NCSD service area. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. As such, no changes in the environmental document are needed.
PH-5	This comment expresses concern over an increase in traffic. Refer to DMW-1, JK-6, and JK-7, which ~~addresses~~address comments related to an increase in traffic congestion and implementation of transportation system improvements.
PH-6	This comment expresses concern regarding the change in visual character of the project area as a result of oak tree removal at the project site. Refer to BR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
PH-7	This comment raises concern regarding the increase in demand on the County Sherriff. The construction of a new patrol station is included in the County's Capital Improvement Plan. As discussed in Section 15, *Public Services*, the project would be subject to the payment of Public Facilities Fees through a Development Agreement by the project applicant and/or prior to issuance of construction permits for subsequent development would provide the project's share of funding for expanded police services and facilities. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. Therefore, no changes in the environmental document are needed. Refer to MR-2, which provides a detailed response related to the provision of emergency services.
PH-8	This comment raises concern over the increase in demand on other public services (i.e., post office) in the community. As evaluated in Section 4.15, *Public Services*, the project would be subject to the payment of fees to provide funding for maintenance of existing facilities and development of additional facilities. The County has discretion to use public facilities fees for projects identified in the County's Capital Improvement Plan. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. Therefore, no changes in the environmental document are needed.
PH-9	This comment requests clarity as to whether implementation of the proposed project and associated population growth would require the community of Nipomo to be incorporated. This comment does not identify a deficiency in the EIR; therefore, no changes in the environmental document are needed.
PH-10	This comment raises concern over the design of the proposed off-site transportation improvements. Refer to JK-7, which responds to comments regarding off-site transportation improvements.

Comment No.	Response
PH-11	This comment suggests looking at alternative locations for the proposed project in order to reduce impacts to oak trees at the project site. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project. Additionally, refer to MR-3 and AG-3, which responds to comments regarding project alternatives to reduce impacts to oak trees at the project site.
PH-12	This comment raises concern regarding an increase in growth in the community and states opposition to the proposed project. Refer to BR-2, which addresses the project's impacts related to an increase in population.

9.5.16 Lawrence E. Cools


Delete Archive Report Reply Reply all Forward

[EXT]Fwd: Agenda item B-1 Dana Reserve Study Session July 21, 2022

MC Margo Cools <2coolsaints@att.net>
To: Jennifer Guetschow
Wed 7/20/2022 7:38 PM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Subject: Fwd: Agenda item B-1 Dana Reserve Study Session July 21, 2022

From: <2coolsaints@att.net>
Date: July 20, 2022 at 7:26:00 PM PDT
To: mbing@slolafco.com
Subject: Agenda item B-1 Dana Reserve Study Session July 21, 2022

Respectfully To All Commissioners:

As a long time resident of Nipomo living in the neighborhood adjacent to the proposed Dana Reserve Development, I strongly oppose this project for all the reasons which you have already heard and received from other residents and concerned parties. This project in its current form would be devastating to the character and environment of Nipomo, always cherished in this community. Please also take into account the indisputable fact that the western United States is in the midst of both a long term serious drought and economic downturn. There is no ability to predict when or how either of these situations might end.

Respectfully,
Lawrence E. Cools

Reply Forward

LEC-1

9.5.16.1 Response to Letter from Lawrence E. Cools

Comment No.	Response
LEC-1	This comment raises concern regarding neighborhood compatibility, drought, and economics. Refer to PH-1, which addresses comments related to neighborhood compatibility and MR-1 and GRe-1 through GRe-4, which responds to comments related to the availability during normal, single-dry, and multiple-dry year conditions. Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the impacts would have a negative impact on the physical environment, or if the impacts would result in growth-inducing impacts. As such, no changes in the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.17 Margaret Cools


Delete Archive Report Reply Reply all Forward

[EXT]Fwd: Agenda item B-1 Dana Reserve Study Session July 21, 2022

MC Margo Cools <2coolsaints@att.net>
To: Jennifer Guetschow
Wed 7/20/2022 7:40 PM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Subject: Fwd: Agenda item B-1 Dana Reserve Study Session July 21, 2022

Respectfully To All Commissioners:

As a long time resident of Nipomo living in the neighborhood adjacent to the proposed Dana Reserve Development, I strongly oppose this project for all the reasons which you have already heard and received from other residents and concerned parties. This project in its current form would be devastating to the character and environment of Nipomo, always cherished in this community. Please also take into account the indisputable fact that the western United States is in the midst of both a long term serious drought and economic downturn. There is no ability to predict when or how either of these situations might end.

Respectfully,
Margaret Cools

Reply Forward

MC-1

9.5.17.1 Response to Letter from Margaret Cools

Comment No.	Response
MC-1	This comment raises concern regarding neighborhood compatibility, drought, and economics. Refer to LEC-1, which addresses these issues.

9.5.18 Matt Kobliska

Jennifer Guetschow
San Luis Obispo County Department of Planning and Building
976 Osos St., Room 300
San Luis Obispo, Ca 93408

RE: Concerns for development in Nipomo off Willow Rd and DEIR

July 20, 2022

Let me start with the traffic studies that have been conducted on Ten Oaks. Even though they show excessive traffic on Ten Oaks, they are not even close to accurate on the actual traffic. The study was in July and the second week of December/first two weeks of January. This is the time when the high school is out of session. Traffic on our street is triple what has been recorder when the high school is in session. I have a camera that records our traffic daily...you are welcome to review it any time. MK-1

Ten Oaks is used as a cut-through for ALL people avoiding Tefft Street in the morning and afternoon. The addition of a traffic signal on the intersection of Willow and Pomeroy was supposed to alleviate traffic on our street. It has increased traffic...I guess folks do not want to wait at the light or travel the extra mile. MK-2

Everyone who lives in Nipomo knows to avoid Tefft Street at high traffic times (morning, late afternoon, weekends). This new development will bring an additional 3,000 cars to a 1-mile square radius...with two exits onto Willow. Cars leaving this development will all use the north exits on to Willow ...even if destination is south. This will create the same problems we now have on Tefft. Is the plan to add additional traffic lights on Willow at the egress? How will you mitigate the traffic back-up to enter/exit the freeway at Willow? With all these additional vehicles attempting to exit/enter this development during high traffic times, it will also increase the traffic on surrounding streets....adding to existing traffic through our neighborhood from all avoiding Tefft Street. MK-3

The county's original plan was to extend Hetrick from Pomeroy to Willow. In doing so, they made the entrance from Willow to Hetrick look like a major intersection...inviting all to drive through our neighborhood. We have eighteen wheelers, school buses, tractors, and dump trucks traveling daily through our streets that were not designed for this traffic. MK-4

Major street improvements must completed PRIOR to the start of this development. The proposed two cut throughs for this development ARE NOT improvements and will not stop cut throughs to existing neighborhoods. They will turn Willow into the same problems we have on TEFT and ADD additional traffic through our neighborhood. Hetrick needs to be a straight shot from Pomeroy to Willow. Willow will need to be four lanes from Pomeroy to east of the highway 101...and the freeway off ramps will need work as well. What is the plan to mitigate an additional 3,000 cars moving during high traffic hours in a ¾ mile stretch? MK-5

I disagree with this development. Too many homes consolidated on small lots will create traffic that cannot be mitigated. The current home make-up for this area is homes on 1 +acre. Let us keep it this way. MK-6

Matt Kobliska
855 Ten Oaks Way
Nipomo, Ca 93444

9.5.18.1 Response to Letter from Matt Kobliska

Comment No.	Response
MK-1	This comment expresses concern over an increase in traffic. Refer to DMW-1, JK-6, and JK-7, which ~~addresses~~address comments related to an increase in traffic congestion and implementation of transportation system improvements.
MK-2	This comment expresses concern over an increase in traffic along local roadways. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic congestion and implementation of transportation system improvements.
MK-3	This comment expresses concern over an increase in traffic. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic congestion and implementation of transportation system improvements.
MK-4	This comment expresses concern over an increase in traffic. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic congestion and implementation of transportation system improvements.
MK-5	This comment asserts the proposed roadway improvements need to be conducted prior to development. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic congestion and implementation of transportation system improvements, including phasing.
MK-6	This comment suggests denial of this project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. Additionally, refer to AG-3, which responds to comments regarding project alternatives to reduce the density of proposed homes at the project site.

9.5.19 Chris Santala

[EXT]Comments on DEIR for Dana Reserve Specific Plan

chris santala <chris.santala@gmail.com>
Wed 7/20/2022 8:46 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello Jennifer,
I am a member of the Nipomo Action Committee, a group recently formed to voice our concerns for the proposed Dana Reserve Development. My specific comments on the DEIR are as follows:

1. Reduce the density of the housing/infrastructure to minimize oak tree, air, traffic, and noise impacts. **CSa-1**

2. Why are only 194 oaks (of the ~4,000) being counted towards replacement planting of 4:1? I see that the majority of the oak mitigation is *preservation* of oaks at "Dana Ridge". Seems to be a lenient oak impact mitigation strategy. More individual oaks should be included in replacement planting to minimize the loss of oak woodland habitat On-Site. If the housing density is reduced (#1 above), there will be more space to plant oaks onsite. **CSa-2**

3. If current oak mitigation strategy goes through - I suggest allowing public access (trails) to create a "Dana Ridge Preserve", similar to the Pismo Preserve. In the future, other landowners could add property to Dana Ridge Preserve, possibly even connecting to the Dana Adobe. **CSa-3**

4. Require the developer to construct a separate/ protected bike/pedestrian path to Nipomo High School, the Nipomo Community Park, and "Uptown". The reason is to create a community connection to the rest of Nipomo (not just more roads), and to reduce automobile use. Without "connection" this is just another giant development forced into unincorporated Nipomo because the cities of SLO, Pismo, Paso, AG etc don't want "affordable housing" or any other massive projects in their backyard. The County has the power to help improve Nipomo and make it an example of how we can create communities that are connected and bike and pedestrian friendly. **CSa-4**

Thank you,
Chris

9.5.19.1 Response to Letter from Chris Santala

Comment No.	Response
CSa-1	This comment suggests reducing the density of the proposed residential uses to minimize impacts to oak trees, air quality, traffic, and noise. Refer to MR-3, JK-4, and AG-3, which addresses comments related to project alternatives, including a rural residential development project alternative.
CSa-2	This comment raises concern over the loss of oak trees at the project site and the adequacy of mitigation included in the EIR to address impacts to oak trees. Refer to MR-3 and JK-4, which addresses impacts related to the loss of oak trees at the project site.
CSa-3	This comment suggests creating trails at the off-site oak mitigation area to allow for public use and extension of the mitigation area to Dana Adobe. Refer to MR-3 and JK-4, which addresses this comment.
CSa-4	This comment suggests creating a bicycle/pedestrian path to Nipomo High School, the Nipomo Community Park, and "Uptown." The project includes the construction of off-site transportation improvements as discussed in JK-7. These improvements were identified by the County to address an increase in vehicles along local roadways associated with the proposed project. According to CEQA Guidelines, a project is only required to implement improvements necessary to serve the proposed project. Additionally, the project includes the construction of pedestrian, bicycle, and transit facilities for the community. Therefore, additional improvements to the transportation system would not be the responsibility of the applicant. As such, no changes in the environmental document are needed.

9.5.20 Elizabeth Scroggs

[EXT]SLO County Planning Commission Dana Reserve Project

Beth Scroggs <b-scroggs@msn.com>
Thu 7/21/2022 9:02 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: Beth Scroggs <b-scroggs@msn.com>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To the SLO County Planning Commission
c/o Jennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.
After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issues which concern me most are:

- Biological impacts: 3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed. These impacts are not replaceable. **ES-1**
- Transportation -increased traffic, impacts on many roads throughout Nipomo that are not designed for this increased level of traffic **ES-2**
- Land Planning: multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project. **ES-3**

Our small town relies on the County to do right by us. I can understand the desire for a development in Nipomo because there are housing needs and land is cheaper than in Arroyo Grande. There is plenty of treeless open land east of Highway 101 that wouldn't require the destruction of almost 4000 native oak trees. , **ES-4**

As a Citizen of Nipomo I respectfully request that another location should be found or, if not, the number of homes needs to be significantly reduced. Please deny this project in its current form until the impacts of the development are greatly decreased. **ES-5**

We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

Thank you for your consideration.

Dated July 21, 2022 Signed: Elizabeth Scroggs
Email contact: b-scroggs@msn.com

9.5.20.1 Response to Letter from Elizabeth Scroggs

Comment No.	Response
ES-1	This comment raises concerns regarding the project's impacts to biological resources. Refer to MR-3 and JK-4, which address comments related to loss of oak trees and BR-1, which addresses comments related to habitat loss and wildlife.
ES-2	This comment raises concerns regarding an increase in traffic congestion. Refer to JK-6, JK-7, and DMW-1, which addresses comments related to traffic congestion in the community.
ES-3	This comment identifies inconsistencies between the proposed project and applicable planning documents. This issue is evaluated in Section 4.11, *Land Use and Planning*, which concludes that there is a Class I impact related to the project's consistency with applicable plans. Therefore, the evaluation included in the EIR is consistent with the intent of this comment and no changes to the environmental document are needed.
ES-4	This comment suggests looking at alternative project locations to reduce impacts to oak trees at the project site. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project. Additionally, refer to MR-3 and AG-3, which responds to comments regarding project alternatives to reduce impacts to oak trees at the project site.
ES-5	This comment suggests looking at alternative locations for the proposed project or reducing the number of proposed residential dwellings. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project and AG-3, which addresses comments related to a rural residential development project alternative.

9.5.21 Nancy Damron

[EXT]Dana Reserve Project

Nancy Lee <nancylee1313@yahoo.com>
Fri 7/22/2022 10:11 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer Guetschow,

I am voicing my opposition to this project as there are too many issues that cannot be satisfactorily mitigated. These issues include (1) the extreme size of the project, (2) the removal of almost 4,000 oak trees which are irreplaceable, (3) over-density of the project resulting in damage to the environment, increased traffic, increased water usage in a drought, and (4) insufficient public services to handle the increase in population, such as law enforcement (already too few sheriffs), fire department, and medical providers and services. The Draft Environmental Impact Report (DEIR), fails to properly address these issues.

NDa-1

Due to these, and other, significant impacts of the project, I request that this project be denied. If it is to be considered further, it should be considered sometime down the road when the drought has eased and a more reasonable plan may be proposed.

Thank you for your consideration.

Nancy Damron

9.5.21.1 Response to Letter from Nancy Damron

Comment No.	Response
ND-1	This comment identifies the project's impacts related to density, loss of oak trees at the project site, traffic, water use, and public services. Refer to BR-2, which responds to comments related to population growth; MR-3 and JK-4, which responds to comments related to loss of oak trees at the site; MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. As evaluated in Section 4.15, *Public Services*, the project would be subject to the payment of Public Facilities Fees through a Development Agreement by the project applicant and/or prior to issuance of construction permits for subsequent development would provide the project's share of funding for expanded police services and facilities. The project would also be subject to the payment of fees to provide funding for maintenance of other existing public facilities and development of additional public facilities. In addition, Mitigation Measure PS/mm-1.1 requires the applicant to set aside land to provide a location for future development of a new CAL FIRE station in the community. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. Therefore, no changes in the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.22 Cheryl Eastman

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- (•) Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) CE-1
- (•) Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed) CE-2
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. CE-3

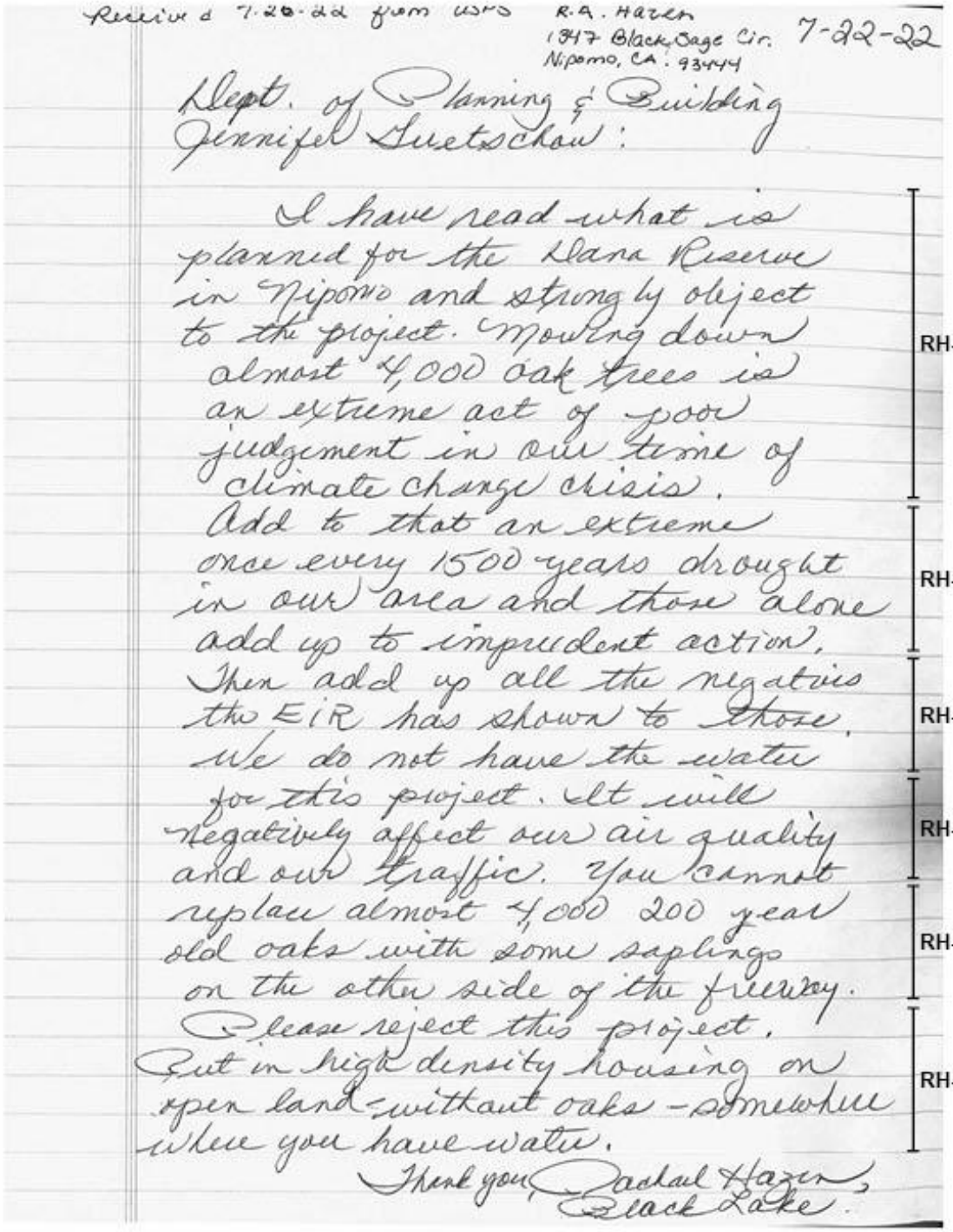
DATE: 7-22-22 SIGNED: Cheryl Eastman
email: tupperchery@gmail.com

*copy this letter into your word processing program.
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408 MUST BE RECEIVED BY AUGUST 1

9.5.22.1 Response to Letter from Cheryl Eastman

Comment No.	Response
CE-1	This comment identifies inconsistencies between the proposed project and applicable planning documents. Refer to ES-3, which addresses this comment.
CE-2	This comment raises concerns regarding the project's impacts to biological resources. Refer to MR-3, JK-4, and BR-1, which address comments related to loss of oak trees, habitat, and wildlife.
CE-3	This comment suggests that the limited social and economic benefits would not outweigh significant impacts associated with the proposed project. Social and economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the impacts would have a negative impact on the physical environment, or if the impacts would result in growth-inducing impacts. As such, no changes in the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.23 Rachael Hazen



Received 7-20-22 from USPS

R.A. Hazen
1917 Black Sage Cir.
Nipomo, CA. 93444

7-22-22

Dept. of Planning & Building
Jennifer Guetschow:

I have read what is planned for the Dana Reserve in Nipomo and strongly object to the project. Mowing down almost 4,000 oak trees is an extreme act of poor judgement in our time of climate change crisis. RH-1

Add to that an extreme once every 1500 years drought in our area and those alone add up to imprudent action. RH-2

Then add up all the negatives the EIR has shown to those. RH-3

We do not have the water for this project. It will negatively affect our air quality and our traffic. RH-4

You cannot replace almost 4,000 200 year old oaks with some saplings on the other side of the freeway. RH-5

Please reject this project. Put in high density housing on open land - without oaks - somewhere where you have water. RH-6

Thank you, Rachael Hazen,
Black Lake.

9.5.23.1 Response to Letter from Rachael Hazen

Comment No.	Response
RH-1	This comment raises concern over the loss of oak trees at the project site. Refer to MR-3 and JK-4, which addresses impacts related to the loss of oak trees at the project site.
RH-2	This comment raises concern over water availability during existing drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which addresses comments related to availability of water supply in normal, single-dry, and multiple-dry year conditions.
RH-3	This comment suggests there is not adequate water supply to serve the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which addresses comments related to availability of water supply in normal, single-dry, and multiple-dry year conditions.
RH-4	This comment expresses concern over the project's impacts related to air quality and traffic. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. In addition, the EIR identifies a Class I impact related to air quality emissions, which is consistent with the intent of this comment. As such, no changes in the environmental document are needed.
RH-5	This comment raises concern over the loss of oak trees at the site, which would alter the visual character of the project site. Refer to MR-3 and JK-4, which addresses impacts related to the loss of oak trees and alteration of the visual character of the site.
RH-6	This comment identifies this commenter's opposition to the proposed project and suggests an alternative location for the development. Refer to SSh(1)-5, which responds to comments regarding an alternative location for this project.

9.5.24 Samantha Myers

[EXT]A letter of concern regarding the Proposed Dana Reserve Project

Gmail <spoblitz@gmail.com>
Fri 7/22/2022 8:25 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Attn: Jennifer Guetschow I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo. After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern): • Housing (imbalanced housing vs job creation, which also increases traffic) • Transportation (increase traffic, impacts on many roads throughout Nipomo) • Air Quality • Greenhouse Gas Emission • Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) • Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed) • Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. DATE: July 22, 2022
SIGNED: Samantha Myers
Email: spoblitz@gmail.com

SM-1

9.5.24.1 Response to Letter from Samantha Myers

Comment No.	Response
SM-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; ES-3, which addresses comments related to applicable planning policies; MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife, and oak trees; and CE-3, which addresses comments related to social and economic impacts. In addition, the EIR identifies a Class I impact related to air quality and greenhouse gas emissions, which is consistent with the intent of this comment. As such, no changes in the environmental document are needed.

9.5.25 Gail Roberts

[EXT]Strong opposition to the Dana Reserve Project

gail roberts <gatroberts@gmail.com>
Fri 7/22/2022 1:51 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer Guetschow
Department of Planning and Building
County of San Luis Obispo Planning and Building Department
976 Osos St Room 300
San Luis Obispo, CA 93408

Re: The Dana Reserve Project:

Dear Ms. Guetschow:

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development proposal to include 288 acres in the Unincorporated Community of Nipomo. My family has lived in Nipomo for 22 years, and moved here because it was a green and rural community. We did not choose to live in a densely populated over-developed area in California, and do not want to live in one now.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issues which concern me most are:

- The densely packed housing plans (imbalanced housing vs job creation) — GRo-1
- Traffic, especially the impact on Willow Road (already a high-speed truck route) and Pomeroy Road — GRo-2
- Air quality and increased greenhouse gas emissions from an influx of thousands of new residents and cars — GRo-3
- Land planning distortions. Multiple elements of the project are out of alignment with the South County area plan, including how this land was intended to be developed vs the present project. The project contrasts dramatically with current residential homes, and telling residents with acreage to "get over it" as an official did at a recent discussion of the project reflects an unwarranted hostility to people who have been part of this community for years. — GRo-4
- Biological impacts - 3,948 mature, protected coast live oak trees to be removed, some of the last contiguous oak woodlands on the Nipomo Mesa, supposedly to be replaced by oak saplings not suitable for residential landscaping. For a detailed analysis of the environmental impacts of this proposed development, I expect you are familiar with the July 2021 letter from the California Native Plant Society sent to your office. Unfortunately none of their concerns appear to have been addressed to date. — GRo-5
- And most importantly for an arid region in the midst of extreme drought conditions - Water. It defies belief that this project was not immediately denied for that reason alone. There is not enough water for current residents and businesses in Nipomo, as we are reminded every month in our ever-increasing water bills. The theoretical possibility of purchasing and importing more water from Santa Maria seems an expensive and far-from-assured 'solution.' — GRo-6

The limited social and economic benefits of the Dana Reserve Project do not outweigh the many significant negative impacts of unchecked growth. As a citizen of Nipomo, I ask that this project be denied. Unless the world changes dramatically in the next few years there will never be enough water to support the largest proposed housing development in this area for 25 years. We owe it to Nipomo to preserve the quality of life for existing residents and retain the natural beauty of the land given to Captain Dana in 1837. — GRo-7

Sincerely yours,

Gail Roberts
gatroberts@gmail.com

9.5.25.1 Response to Letter from Gail Roberts

Comment No.	Response
GRo-1	This comment expresses concerns related to the project's impacts related to the density of proposed housing. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
GRo-2	This comment expresses concern related to traffic congestion along Willow Road and Pomeroy Road. Refer to DMW-1 and JK-6 and JK-7, which addresses comments related to an increase in traffic along Willow Road, Tefft Street, and other local roadways associated with the proposed project.
GRo-3	This comment addresses concerns of the project's impacts related to air quality and greenhouse gas emissions. As evaluated in Section 4.3, *Air Quality,* of the EIR, with implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, construction-related emissions would not exceed SLOAPCD's daily or quarterly Tier 2 significance thresholds. Mitigation Measure AQ/mm-3.3 has been included to require implementation of SLOAPCD-recommended mitigation measures to reduce long-term operational air quality pollutant emissions. Additional mitigation measures, in addition to SLOAPCD recommended measures, have also been included to further reduce operational emissions. The proposed project includes California Air Pollution Control Officers Association (CAPCOA)-recommended VMT reduction strategies within its site design, and Mitigation Measure TR/mm-3.1 has also been included to reduce VMT and associated emissions. With implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational annual emissions would be reduced to below SLOAPCD's significance threshold; however, daily emissions would continue to exceed SLOAPCD's significance threshold. As such, this issue area has been identified as a Class I impact, which is consistent with the intent of this comment. As evaluated in Section 4.8, *Greenhouse Gas Emissions* of the DRSP EIR, With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1, operation of the Specific Plan Area would have a less-than-significant impact on the environment related to GHG emissions. However, a Class I impact was identified as a result of the project's inconsistency with applicable GHG-reduction plans due to exceedance of VMT thresholds of significance. Therefore, construction and operation of the DRSP area would not exceed GHG emissions thresholds but would contribute to regional VMT in a manner that is inconsistent with strategies intended to reduce GHG emissions. As such, this issue area has been identified as a Class I impact, which is consistent with the intent of this comment. Therefore, no changes in the environmental document are needed.
GRo-4	This comment expresses concerns related to the project's impacts related to consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
GRo-5	This comment expresses concerns related to the project's impacts related to biological resources. Refer to MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife, loss of oak trees, and alteration of the visual character of the project site.
GRo-6	This comment raises concern over the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
GRo-7	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts and MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.26 Deah Rudd

[EXT]Dana Reserve Project SLO Planning Commission c/o Jennifer Guetschow

deah rudd <deahrudd@att.net>
Fri 7/22/2022 11:32 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: deah rudd <deahrudd@att.net>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To SLO Planning Commission re Dana Reserve Project: SLO Planning Commission c/oJennifer Guetschow; jguetschow@co.slo.ca.us

Department of Planning and Building ATTN: Dana Reserve/Jennifer Guetschow 976 Osos Street, Room 300 San Luis Obispo, CA 93408

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo. After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable **Significant Class 1 issue which concerns me most is Water loss: our dropping water table. We have had to drill a new well at 1189 Mesa View Dr., Arroyo Grande and our neighboring property at 1195 well which was drilled only about 12 years ago is in need of drilling deeper for water; property without water is useless and valueless; and in addition the following: • Housing (imbalanced housing vs job creation, which also increases traffic) • Transportation (increase traffic, impacts on many roads throughout Nipomo) • Air Quality • Greenhouse Gas Emission • Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) • Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed) • Water and public services; not determined to be a class 1 issue in the EIR including but not limited to all of the aforementioned. The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project.** As a citizen of Nipomo Mesa, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DRu-1
DRu-2
DRu-3
DRu-4

DATE: __7/22/22__ SIGNED:_Deah Rudd_____ email: _deahrudd@att.net phone: 805-710-2739

9.5.26.1 Response to Letter from Deah Rudd

Comment No.	Response
DR-1	This comment raises concern over the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DR-2	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, and biological resources. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; MR-3 and BR-1, which addresses comments related to habitat loss and wildlife, and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
DR-3	This comment expresses concern related to availability of water supply and public services. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year condition. Refer to MR-2, BR-6, PH-7, and PH-8, which responds to comments related to public services. As evaluated in Section 4.15, *Public Services*, the project would be subject to the payment of fees to provide funding for maintenance of existing facilities and development of additional facilities. In addition, Mitigation Measure PS/mm-1.1 requires the applicant to set aside land to provide a location for future development of a new CAL FIRE station in the community. Therefore, no changes in the environmental document are needed.
DR-4	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.27 Julie Tacker

From the Desk of Julie Tacker

July 22, 2022

San Luis Obispo County Planning & Building Department
976 Osos Street, Room 200
San Luis Obispo, CA 93408
Attention: Trevor Keith, Director

Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (PLN1118, SUB2020-00047, LRP2020-00007, ED21-094) Request for comment period to be extended.

Dear Mr. Keith,

On June 16, 2022 a Notice of Availability for the above referenced project was issued. On June 22nd, nearly a week after the published notice, Jeff Edwards and I attempted to access the county's web-link to the Dana Reserve Specific Plan DEIR and were unable to. Upon discovery of the web-link being inoperable, Mr. Edwards immediately notified, by email, Jennifer Guetschow, the planner on the project that he was having difficulty (email string attached). Later that day, during a Zoom meeting with Xzandrea Fowler and Schani Siong, Mr. Edwards also alerted them to the problem accessing the DEIR webpage.

Both Ms. Fowler and Ms. Guetschow were responsive. Ms. Fowler responded later June 22nd with a link that was not operable and the next day Ms. Guetschow responded with a link that takes one to ca.gov (the home page of California state website).

It is unclear how long the DEIR website was unavailable to the public. Out of the abundance of caution, I ask that the comment period remain open at least another week, due to the possibility that the web-link was unavailable from the noticing date of June 16th to June 23rd, the day after Mr. Edwards notified members of your the staff.

Beyond the question of DEIR availability there are several other reasons to consider extending the comment period. One, this is a large project; it is complicated and will have potential long-lasting impacts. Secondly, the comment period occurs during the height of summer, when people are on vacation and/or distracted with travel and visitors. It would be best to extend this important project's DEIR comment period to ensure the procedural aspects of the projects consideration are defensible when final decisions are made.

All things considered, I request, as lead agency the County of San Luis Obispo, extend the comment period for the DEIR to August 31st.

JuT-1

1

From the Desk of Julie Tacker

Sincerely,

Julie Tacker

Julie Tacker
P.O. Box 6604
Los Osos, CA 93412
805-235-8262

c- Airlin Singwald
Xsandrea Fowler
Jennifer Guetschow
Schani Siong
Brian Stack

7

9.5.27.1 Response to Letter from Julie Tacker

Comment No.	Response
JuT-1	This comment requests an extension of the public comment period due to accessibility issues of the DEIR on the County's website, which was quickly remedied, and complexity of the proposed project. In accordance with State CEQA Guideline the public review period for an EIR is 45 days. Public circulation of the EIR was consistent with this requirement. In addition, refer to JE-1 which addresses comments related to accessibility. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.28 Mike Watson



Gmail

Bonnie Watson <bwatson1756@gmail.com>

[no subject]

Bonnie Watson <bwatson1756@gmail.com>
To: Bonnie Watson <bwatson1756@gmail.com>
Fri, Jul 22, 2:46 PM

Letter/email to SLO Planning Commission re: Dana Reserve Project

SLO Planning Commission
c/o Jennifer Guetschow, jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 2158 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is: (circle item/highlight or write in your greatest concern):

(1) Housing (unbalanced housing vs job creation, which also increases traffic)
(2) Transportation (increase traffic, impacts on many roads throughout Nipomo)
(3) Air Quality
- Greenhouse Gas Emission
(4) Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
(5) Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

THE POSSIBLE ALTERING OF THE ETHOS OF OUR SMALL TOWN ATMOSPHERE HERE IN NIPOMO!?!

The iterated social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and returns the natural beauty of the land given to Captain Dana in 1837.

DATE 7/22/2022 SIGNED Michael D. Watson
email MIKEWATSON822@YAHOO.COM

*copy this letter into your word processing program.
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408
MUST BE RECEIVED BY AUGUST 1
[Quoted text hidden]

MW-1

9.5.28.1 Response to Letter from Mike Watson

Comment No.	Response
MW-1	This comment expresses concern related to the density of proposed housing, transportation, air quality, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality emissions; ES-3, which addresses comments related to applicable planning policies; MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife, loss of oak trees, and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.29 Milly Bruno

[EXT]Fw: Dana Reserve EIR

Milly Bruno <jomibru@att.net>
Sat 7/23/2022 9:31 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I am a resident of Nipomo and have lived here for almost 24 years.

I want to voice my concern about the huge proposed development called Dana Reserve. I believe it has too many houses for the area to handle. The impact on traffic, schools and water will be enormous. Where are they going to get the water if this drought continues? Will Santa Maria be willing to provide more water when their own population might suffer as a result? MB-1

The loss of 3,948 native Oaks is unbelievable and the so-called mitigation of buying some land on the fringe of where oaks can survive would be laughable, if it wasn't tragic. The loss of Oaks goes along with the loss of Oak Woodland and habitats for federally endangered species. MB-2

Please consider all of the ramifications of a project this size and send the developers back to the drawing board. MB-3

Thank you,

Milly Bruno
1020 La Serenata Way
Nipomo, CA 93444

9.5.29.1 Response to Letter from Milly Bruno

Comment No.	Response
MB-1	This comment expresses concerns related to the density of the proposed project, which would result in impacts to traffic, schools, and the reliability of water supply. Refer to BR-2, which addresses comments related to population and housing growth; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of transportation improvements; BR-6, which responds to comments regarding public schools; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and MR-1 and JK-1, which responds to comments related to the reliability of water supply from the NSWP.
MB-2	This comment expresses concerns related to the loss of oak trees and associated wildlife habitat at the project site. Refer to MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife loss of oak trees, and alteration of the visual character of the project site.
MB-3	This comment suggests reducing the size of the proposed project. Refer to AG-3, which addresses comments related to a rural residential development project alternative.

9.5.30 Susan Nanas Calvert

[EXT]Proposed Dana Reserve Project

SNanasCPA <SNanasCPA@aol.com>
Sat 7/23/2022 4:08 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo. After reading the Draft Environmental Impact Report (DEIR), the issues which concern me the most are:

- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Water Shortage

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

SNC-1

07.23.23

Susan Nanas Calvert

SNanasCPA@aol.com

Susan

9.5.30.1 Response to Letter from Susan Nanas Calvert

Comment No.	Response
SNC-1	This comment expresses concerns related to air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, water supply, and social and economic impacts. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; MR-3 and BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.31 Christine Freytag

[EXT]Dana Reserve Project

Freytag, Christine L. - US <christine.freytag@caci.com>
Sun 7/24/2022 1:10 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: Freytag, Christine L. - US <christine.freytag@caci.com>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

July 24, 2022

SLO Planning Commission
Re: Dana Reserve Project:
C/O Jennifer Guetschow
jguetschow@co.slo.ca.us

Dear Jennifer Guetschow,

I am writing to express my concern regarding the proposed Dana Reserve Project, a development project that will develop 288 acres in the unincorporated County community of Nipomo. After seeing the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 Issues that concern me most is:

- **Imbalanced jobs to housing ratio in Nipomo** – Nipomo does not have enough local jobs to support the number of proposed dwellings which will result in much more traffic than we already have, in Nipomo and all along 101. More traffic yields more road rage, and more environmental harm.
- **Misguided Land Planning** – Multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed versus the present project.
- **Habitat impacts** – Removal of nearly 4,000 live oak trees and the habitat they provide for the natural wildlife, vulnerable and endangered species who live in this project area.
- **Water Concerns** – I can't fathom how water was not considered to be a Class 1 Issue in the DEIR. I do everything I can to conserve water. I might as well stop that altogether because if this faulty project goes forward, the State and County are going to be telling ME to cut back even more on MY water consumption because the Dana Reserve Project is consuming way more water than the DEIR projected.

CF-1

CF-2

The limited social and economic benefits of the Dana Reserve Project will not outweigh the detrimental impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. Nipomo deserves a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land.

CF-3

Sincerely,

Christine Freytag
519 Charro, Nipomo, CA, 93444
christine.freytag@caci.com

9.5.31.1 Response to Letter from Christine Freytag

Comment No.	Response
CF-1	This comment expresses concerns related to the jobs-to-housing ratio in the community, consistency with applicable planning documents, and biological resources. Refer to BR-2, which addresses comments related to population growth and associated impacts, including the jobs-to-housing ratio; and ES-3, which addresses comments related to applicable planning policies; MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife, loss of oak trees, and alteration of the visual character of the project site.
CF-2	This comment expresses concern regarding water supply for the existing community in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
CF-3	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.32 Kelly Kephart

[EXT]ATTN: Dana Reserve/Jennifer Guetschow

Kelly Kephart <mountainviolet@gmail.com>

Sun 7/24/2022 3:27 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: Justin Kephart <Kephartjustin@gmail.com>

1 attachments (71 KB)

Dana Reserve EIR Specific Comments.pdf;

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,

I am sending this email which contains a letter about the Dana Reserve Project and a separate document with comments on the EIR, located at the end of the email.

I am very concerned with the amount of significant impacts the current applicant preferred Dana Reserve Project will have on the Nipomo Community.

This project makes a mockery of and stands to undermine the existing Oak Tree Ordinance for all future developments to come in the county. It took the wholesale removal of over 2,000 oaks at Justin Winery to get this current ordinance, what is it going to take for us to get tough on developers with regards to oak removal? 4,000 trees? 10,000 trees? When is enough, enough? The developer wants to us to think that he is environmentally responsible because he is preserving the oaks in the middle of the project site, and buying a hill top parcel with oak trees. However, this is really hypocritical because neither of these locations are really developable. In fact, the Dana Ridge mitigation site has vastly different species and contains none of the special-status species found on-site. Shouldn't mitigation really be like for like? If this project is approved as is, in the future, developers will continue to clear large swaths of trees in prime habitat for oaks and other sensitive species, in favor of undesirable locations on the fringes of where oaks can survive, leading to a total net loss of oaks in the county. As a land manager I have recently seen many of these large oak trees die of drought, loss of multiple limbs, uprooting and other diseases. Many of the locations where oak trees occur are seeing no new regeneration, meaning these systems are dying. There is a way to reduce the impacts to onsite oaks and rare plants and habitats, look at additional alternatives! This project is overly packed with homes, to the detriment of the biological resources on site. Reduce the overall amount of houses in each neighborhood, maintain linkage of the native habitats left onsite or consider alternative 3 as the more acceptable alternative for this development. KK-1 KK-2 KK-3

In the EIR it's stated that "The County's South County Area Plan includes an outline for future development of La Canada Ranch on the project site, which identified the following land uses in order of priority: open space uses, industrial park(s) retail uses, commercial retail uses, and residential areas. The prioritization of these land uses show that preservation of on-site oak woodlands and development of job-generating commercial and industrial uses were intended to be the primary focus of future development on-site for La Canada Ranch." Why did this project not follow the South County Area Plan? If we were to follow the south county plan, Alternative 3 is the most in-line alternative vs this project with bloated housing, jobs/housing imbalance, and blatant removal of oak trees, in which preservation was supposed to be the top priority. Additionally, the Dana Reserve project proposes some 1,290 dwelling units on 288 acres; thus this one project, if fully built out, would absorb almost 40 percent of the county's state-mandated Regional Housing Needs Allocation (RHNA). Further development in Nipomo will only exacerbate this imbalance, since Nipomo holds only about 25 percent of the population of the county's unincorporated area. Nipomo should not be the "fix-it" area for the county-wide shortage of housing, especially since most of the people that live in Nipomo commute to either Santa Maria or SLO, there are so few jobs locally. And what does this mean for the affordable housing on-site? These people will need to commute in order to get to their work, doesn't it make more sense to build affordable housing closer to the jobs in the county? KK-4 KK-5

The EIR itself states that although water allocations from the NCSD should exceed buildout of the project, "the specific timing of buildout of the DRSP is not currently known and the reliability of future water supply is uncertain due to the potential for prolonged periods of drought and increasing water demands due to population growth." In the project's own EIR, they are concerned that the drought will exceed the stage V drought analysis, so much so that in order to develop each stage, water allocations will have to be deemed sufficient. However, despite all the work to bring water into the new development, a solid water recycling line plan to supplement water resources was not developed for this project. If we build a new development in a water parched area, we should include all water saving measures at our disposal, not just leave it to chance that the developer will do it when the time comes. KK-6

Despite Planning Commissioner Don Campbell saying neighboring houses on acreage should "get over" having high density housing immediately adjacent to their properties during the July 14th public meeting, there are real concerns from neighbors on these lots when the zoning for the neighboring property is proposed to be changed from Rural Residential (RR) to Single Family (SFR) or Multi Family Residential (MFR) zoning. Neighbors adjacent to this project have roosters, chickens, horses and cattle, despite Don's comments that this area "is not AG", these residences are allowed these animals in certain densities on their land. Unfortunately, new families moving into these SFR and MFR lots may not be so understanding of these animals. In many cases, the only space between these lots is a 15 ft setback with an equestrian trail. Although this equestrian trail is an amenity of the project, the buffer will not be enough to prevent the future conflicts that will occur between these lots with drastically different zoning on the other side. We need to see a redesign of the plan to include less housing along the perimeter of the neighborhoods in order to mitigate this zoning discrepancy. KK-7

This model of viable commercial sites within the mixed use space has not worked locally. Trilogy is one example. Fifteen years later Shea is still trying to find a workable solution for the land that was proposed to be a hotel, and other amenities/businesses (and we are speaking about an experienced developer). Dignity Health and an investment firm office are the only takers so far. The Dana Reserve project developer described the mixed use buildings to be exactly what Trilogy promised to its home buyers. How will that look if the developer sells these amenities only to have them fall through? Especially since this project already has a housing/jobs imbalance. KK-8

The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further contribute to this exceedance, which would impact the experience for all existing Nipomo residents. Additionally, this development is within the Large Elementary boundary, which doesn't KK-9

have the capacity for all students expected to attend, so the EIR states its likely all of these students will need to go to Nipomo Elementary. This school is on the other side of the freeway, and it's likely that this will cause additional backup on either North Frontage and Tefft or Thompson as most kids will be picked up and dropped off. The EIR consultant stated during the July 14th call that Lucia Mar Unified School District (LMUSD) had concerns about this plan, but that fees mitigated this concern under CEQA. However, I would say that additional alternatives to this development plan, which would reduce the overall amount of homes on-site would help to alleviate LMUSD's and existing residents' concerns.

KK-9

Although the development of a park in the middle of the development seems like an amenity, County Parks comments in the EIR state that "the proposed park site is too small and encumbered with drainage features that should not count toward acres used for park land" with regards to the CEQA analysis. Additionally, the developer requested that a Quimby Fee credit for conveyance of the park land to the County be waived. However, County Parks stated that "a waiver of Quimby Fees would mean the long-term maintenance of the park would not be adequately accommodated." How can we let a developer propose a park, then not help pay for the long term maintenance? If Quimby fees are not paid, does the developer expect that long-term maintenance of the park will be paid out of HOA fees as discussed in the Dana Reserve Specific Plan? How does this affect the costs incurred by the affordable housing residents on-site?

KK-10

With regard to affordable housing, there are many amenities within the development that are proposed that would be beneficial. However, these amenities come with a cost. As stated in the Dana Reserve Specific Plan, HOA's would be used for long term maintenance of facilities. As we know, HOA fees typically go up over a period of time. Add in the requirements for all electric homes required to mitigate GHG and air emissions, there may be many hidden costs for those residents we are hoping to provide this housing to, so much so, can we say that the operating costs of these houses will be affordable?

KK-11

Have you driven through Nipomo lately? Do you know where Nipomo gas stations are? Grocery stores? Pharmacies? Hardware store? They are all accessed by using Tefft st. This project's access to Willow Road and 101 will do little to ease the traffic flowing to Tefft street as the additional 4,500 plus new people to Nipomo need these same services. The Nipomo Swap Meet on North Frontage road causes huge backups on Mary street and Tefft as people enter and exit on Sundays, so much so that additional enforcements on that day is needed just to keep all traffic flowing on Tefft street. Although the extension of frontage (which is a small two lane road) appears to be a benefit, it doesn't work if the rest of Mary and Tefft is backed up from other traffic. The increased traffic from this development will cause safety hazards at Camino Caballo's entry and exit to Pomeroy, which has limited visibility and is difficult to access due to speeding cars. Same issue at Pomeroy and Sandydale. A fatality in 2019 on the blind curve highlights the safety concerns with additional traffic for residents trying to turn left onto their street. As stated in the EIR, the majority of people in Nipomo commute north or south on Highway 101 to work. This large development is only going to exacerbate the backup on 101 as it is inevitable that the head of household jobs needed to afford the 600k starting price for these new homes will not be made up with the likely low paying service jobs created by this project. Unfortunately for us in Nipomo, we are too rural for improvements on this section of highway.

KK-12

Apparently the applicant and county believe otherwise, that Nipomo is ready for 4,500 plus new people even though our infrastructure, and services are lacking. Despite the fact that Nipomo is taking an un-equal share of the housing which will mean destroying 96% of all oak woodland, and 97% of all special status habitats on this rare piece of land. Maybe high density and affordable housing should be closer to the actual jobs in the county instead of Nipomo which already has an imbalance of housing vs jobs, which contributes to commuting and traffic issues. SLO county continually touts itself as an Environmental leader, this project is a test of that. Do not let a developer get away with an overly ambitious project that has 6 significant class 1 impacts, **the social and economical benefits do not outweigh the significant impacts this project will have on the existing habitat and community members**. Send this project back for development of more alternatives!

KK-13

Kelly Kephart

Comments on the EIR:

Transportation

Comment: Although bike and pedestrian paths consistent with county standards are part of the proposed plan within the development, the overall goal is to reduce VMT regionally and within Nipomo. The bike paths on Pomeroy are class 2, but are dangerous due to the lack of separation from fast moving vehicles and ingrown vegetation into the bike lane. It is unlikely that residents will use this to reduce VMT within the plan area. Additionally the North Frontage has no bike lane and sidewalks are difficult to bike on due to power poles and hydrants within the sidewalk paths. Although frontage will connect from Sandydale to Willow, walkability and bike use would increase from the development to major shopping centers on Tefft with the improvements to this section of road. Improvement of the sidewalk corridor (removal of poles and hydrants from walkway) and the addition of a bike lane should be incorporated into the off-site improvements.

TR Impact 4: Off-site improvements would not generate VMT in a manner that would be inconsistent with State CEQA Guidelines Section 15064.3(b). Impacts would be less than significant (Class III).

OFF-SITE TRANSPORTATION IMPROVEMENTS

The proposed project would include off-site transportation improvements (e.g., Frontage Road extension near Sandydale Drive adjacent to the southeast corner of the plan area, widening of Willow Road, new traffic signals at Willow Road intersection with Collector A). In addition, fair-share contributions to other off-site improvements such as the new traffic signals at Willow Road/US 101 northbound and southbound ramps would be required as part of the individual projects within the Specific Plan Area boundaries. As noted above, transportation projects that add roadway capacity on local or collector streets can be presumed to have a less-than-significant impact if a project also substantially improves conditions for pedestrians, cyclists, and transit. Because the project would develop an interconnected system of pedestrian and bicycle facilities that connect with existing pedestrians and bicycle facilities in the community of Nipomo, the project's off-site transportation improvements would have a *less-than-significant impact* to VMT as it relates to induced demand.

- Comment: this Impact needs to be clarified as the language is confusing. Additionally, if what's stated is that impacts to collector roads will be less than significant because of the addition of pedestrian and bike paths, this is incorrect. The bike paths and pedestrian paths within the development should be classified as "recreational" and do not really impact VMT as pedestrians and bikers will be unlikely to use existing bike/sidewalk connectors due to hazardous conditions in the sidewalks on North Frontage and class two bike lanes Pomeroy. This impact needs to be re-assessed after being clarified.

KK-14

TR Impact 5: Phased buildout of the Specific Plan Area would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant (Class III).

Comment: Hazards will be substantially increased to due to the design of the project. In order to access the elementary school identified for this project (Dorthea Lange Elementary), there will be increased traffic on Pomeroy. This traffic and entry/exit on Pomeroy will increase hazards for residents on Sandydale Drive. Access for this collector road is on a blind corner, where residents have to turn left across traffic. There has already been one fatality in 2019 and multiple crashes into the residence on the corner of Sandydale and Pomeroy. In order to mitigate this increased hazard, a left hand turn lane should be incorporated into the design of the Project. Additionally, increased

KK-15

traffic will utilize small rural roads such as Camino Caballo and Osage in order to access Dorothea Lange Elementary. The hazards at the intersection at Camino Caballo and Pomeroy will increase due to the design of the project, where there is no stoplight and visibility its low when turning left towards the development. A stoplight at this intersection should be incorporated into the design. This will also increase VMT opportunities as there would be a safe crosswalk across Pomeroy to access the Nipomo Park and Native Garden, so walkability and bike-ability will be increased.

KK-15 (cont'd)

Utilities and Service Systems

Comment: The EIR includes a "conceptual" recycled water line that was obviously analyzed during project development as acre foot projections from this line were included in the EIR. However, it is unclear why this conceptual line was included if not fully developed and part of the project? As the EIR states "the reliability of future water supply is uncertain due to the potential for prolonged periods of drought and increasing water demands due to population growth" the development and inclusion of the recycled water line should be included as a mitigation measure for this project.

KK-16

Biological

page 4.4-47; Principle 1: Preserve open space, scenic natural beauty, and natural resources. Conserve energy resources. Protect agricultural land and resources.
Potentially Consistent. The project will protect the densest area of oaks on the property in an attempt to preserve the scenic natural beauty of the area.
Comment: Why is this considered "Potentially consistent"? The oaks preserved by this project are the least visible from the community and hwy 101 based on the visual analysis for the project and the need to plant screening oaks of certain sizes. This impact should be considered "potentially inconsistent"

KK-17

Page 4.4-47; Policy Objective 6.4. Conserve and protect natural, sensitive, and agricultural resources. Again, why is this considered "Potentially consistent"? Based on the rest of the biological analysis, there would be a net loss of oaks in the County, therefore the project does not conserve and protect natural, or sensitive resources. This impact should be considered "potentially inconsistent"

KK-18

Page 4.4-56; BIO/mm-2.3 doesn't appear to include a clarkia mitigation plan required or timeframe for monitoring of this mitigation. Additionally, there appears to be limited connected "undeveloped area" adjacent to oak woodland in order to complete this mitigation. Areas where mitigation is proposed should be included in figures as it is unclear how this mitigation will be implemented. Concerns with this plan includes: residential and recreational uses immediately adjacent to the "preserved" oak woodland on-site and potential mitigation sites, potential distance between existing populations and "mitigation" populations for pollination, and the lack of necessary disturbance in order to continue to provide open spaces for germination of this species in the future.
Page 4.4-73;
If appropriate habitat is not available in San Luis Obispo County at a 2:1 ratio, the applicant may fulfill half of this mitigation requirement through restoring Burton Mesa chaparral in Santa Barbara County at an additional 2:1 ratio (e.g., if only 35 acres can be preserved/restored within San Luis Obispo County, then an additional 70 acres would be required to satisfy the mitigation if purchased in Santa Barbara County).

KK-19

A combination of preservation and restoration at a 2:1 ratio would allow for a no-net-loss of cover by Burton Mesa chaparral constituent elements and maintain species diversity within the county.
Comment: Allowing for preservation of these communities outside of the county is not acceptable mitigation. Additional preservation on-site in the form of conservation easements over existing habitat needs to be considered.

KK-19 (cont'd)

Page 4.4-78:
Small residential parcels along the southeastern and southwestern boundaries of the project area inhibit wildlife movement south or west from the project area.
Comment: This statement is a generalization and is not factually correct. Wildlife routinely utilizes the SBR residential parcels on Sandydale, and the property on north frontage to connect to the Nipomo Native Garden and Nipomo Community Park. Coyotes, garter snakes and jackrabbits are species commonly seen in these areas. This statement needs to be corrected.

KK-20

Alternatives Analysis

Although Alternatives 1-5 are assessed in the EIR, there are no accompanying figures for anything other than Alternative 3. Alternative 4 only shows a figure showing the habitats on-site. How can the public determine that the alternatives analysis was sufficient if figures similar to Alternative 3 are not available within the EIR. Figures showing the development footprint for each alternative should be included for public viewing within the EIR.

Since alternative figures were not included, it is unclear if an additional alternative where the total number of housing units in NBD 4-9 were reduced overall to cluster housing in smaller, denser neighborhoods. Perhaps this is Alternative 2, but it's unclear as Alternative 2 states "Based on the significantly reduced development footprint, ***if properly situated***, Alternative 2 could largely avoid direct removal and impacts to oak woodland and Burton Mesa chaparral." It appears that Alternative 2 was not fully analyzed as it's not clear "if the development was properly situated" to actually reduce impacts. Alternative 2 needs to be re-analyzed and a figure showing the proposed Alternative 2 should be included in the EIR.

The alternatives are un-inspired, it appears the only goal of this project is maximum buildout of the project with no regard for biological resources. High density apartments that are not SFR should be built in the grasslands in the middle of the project to add housing that doesn't conflict with biological resources. The fact that this impacts visual resources is not an issue as all of the alternatives already impact visual resources.

KK-21

9.5.32.1 Response to Letter from Kelly Kephart

Comment No.	Response
KK-1	This comment asserts that the proposed project is inconsistent with the County's Oak Woodland Ordinance due to the removal of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site. In addition, refer to ES-3, which addresses comments related to applicable planning policies.
KK-2	This comment asserts that the proposed project would allow for future large-scale tree removal throughout the county. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site and ES-3, which responds to comments related to inconsistency with applicable planning documents, including the County's Oak Woodland Ordinance.
KK-3	This project suggests developing additional alternatives, which allows for the preservation of native habitat on-site or to consider Alternative 3 as an acceptable alternative for this project. Refer to MR-3 and JK-4, which responds to comments related to a loss of oaks, AG-4, which responds to comments related to the alternatives analysis; JK-5, which responds to comments regarding an alternative site layout intended to reduce impacts to native habitat; BR-3, which addresses comments related to a rural residential development project alternative.
KK-4	This comment identifies that the proposed project differs from the intended development for the project site as identified in the South County Area Plan. Refer to ES-3, which addresses comments related to applicable planning policies. In addition, the La Cañada Ranch Specific Plan alternative (Alternative 2) was evaluated in Chapter 5, *Alternatives Analysis*, of the DRSP EIR. Under Alternative 2, buildout of the project site would result in an increase in light industrial and commercial development and a decrease in residential development. This alternative would also substantially increase the amount of land designated for open space and eliminate recreational land uses. As a result, impacts related to air quality, GHG emissions, population and housing, and transportation would be reduced. However, this alternative would result in similar impacts related to biological resources and would increase impacts related to recreation. Although this alternative would facilitate the future development of residential land uses, due to the substantial reduction in the number of proposed units, the number of affordable units and affordability of market rate units would be significantly decreased in order to provide funding for site development and other improvements. As a result, Alternative 2 would not meet some of the basic project objectives. As this evaluation is included in the EIR, this comment does not require any change to the environmental document.
KK-5	This comment raises concern over the density of the proposed project and associated housing and population growth, which would further affect the jobs-to-housing ratio. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
KK-6	This comment raises concern regarding the available water supply for the proposed project during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
KK-7	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock on surrounding parcels and suggests a reduced density of homes along the perimeter of the project site. Refer to AG-3 and AG-4, which ~~addresses~~address comments related to project alternatives. In addition, according to the Right-to-Farm Ordinance, pre-existing agricultural processing and other operations shall not be considered nuisances due to a change in the area surrounding the operations (Section 5.16.030 and 5.16.031). As this evaluation is included in the EIR, this comment does not require any change to the environmental document.
KK-8	This project raises concern regarding the viability of proposed commercial uses within the project site and the community's jobs-to-housing balance. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance. Additionally, economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Therefore, this comment does not require any change to the environmental document.
KK-9	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.

Comment No.	Response
KK-10	This comment raises concern regarding recreational facilities and the request to waive associated fees. As evaluated in Section 16, *Recreation*, of the EIR, Construction of the proposed on-site recreational facilities would reduce the demand on existing recreational facilities within the county and the community by providing new local recreational facilities within the Specific Plan Area. The applicant has requested to waive the payment of Quimby Fees based on the dedication of a 10-acre lot to facilitate development of a public park. As a result, the project would not contribute funding for maintenance and development of existing and new recreational facilities included in the County's Capital Improvement Plan. However, based on the amount of existing regional and community recreational facilities, the project is not anticipated to result in substantial physical deterioration of existing parks or other recreational facilities. Additionally, refer to ES-3, which addresses comments related to applicable planning policies, including potential policy inconsistencies related to a waiver of Quimby Fees.
KK-11	This comment raises concern over the affordability of housing units with associated fees. As evaluated in the EIR, the purpose of the DRSP is to provide affordable homes to the community, which is possible based on the density of the proposed development. As such, this concern as addressed in the EIR. However, social and economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the impacts would have a negative impact on the physical environment, or if the impacts would result in growth-inducing impacts. As such, no changes in the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
KK-12	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
KK-13	This comment expresses concerns related to population growth in addition to social and economic impacts and availability of water supply. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance and CE-3, which addresses comments related to social and economic impacts.
KK-14	This comment requests clarity of TR Impact 4, which states that off-site improvements would not generate VMT in a manner that would be inconsistent with State CEQA Guidelines Section 15064.3(b). This comment asserts that hazards along existing roadways would preclude use of proposed bicycle and pedestrian facilities. Refer JK-6 and JK-7, which responds to comments related to traffic congestion and implementation of improvements.
KK-15	This comment requests clarity of TR Impact 5, which states that phased buildout of the Specific Plan Area would not substantially increase hazards due to a geometric design feature or incompatible uses. This comment asserts that the project would increase hazards along existing roadways. Refer JK-6 and JK-7, which responds to comments related to traffic congestion and implementation of improvements.
KK-16	This comment asserts that a recycled water line should be included as mitigation in the EIR. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions. The project includes the implementation of improvements identified in the *Dana Reserve Water and Wastewater Service Evaluation,* which have been identified to serve the proposed project. Based on the reliability of the NCSD water supply, implementation of necessary NCSD water and wastewater improvements, and implementation of USS/mm-3.1, which was conservatively included in the EIR, additional mitigation would not be required. According to CEQA Guidelines, a project is only required to implement improvements necessary to serve the proposed project. Therefore, additional improvements to NCSD infrastructure would not be the responsibility of the applicant. As such, no changes in the environmental document are needed.
KK-17	This comment expresses concerns related to the loss of oak trees and associated change to the existing visual character at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
KK-18	This comment asserts that Policy Objective 6.4 "Conserve and protect natural, sensitive, and agricultural resources" should be considered potentially inconsistent rather than potentially consistent. The EIR states "The project will protect the densest area of oaks on the property. Project mitigation will require the applicant to preserve open space that contains sensitive Burton Mesa chaparral and oak woodland habitats that contain populations of special-status species." Refer to ES-3, which addresses comments related to applicable planning policies. Additionally, refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site.
KK-19	This comment raises concerns related to the adequacy mitigation for pismo clarkia. EIR Mitigation Measure BIO/mm-2.3 requires 90 percent of the Pismo clarkia population to be preserved on-site and requires restoration of the 10 percent that would be removed. Pismo clarkia will be mitigated at a 3:1 ratio of reoccupied habitat to occupied habitat impacted. The population extent and number of plants impacted will be equal to or will not exceed 0.02 acre and/or 40 individuals when seasonal climate conditions are similar to 2020 climate conditions. Using seeds collected from the impacted population and preserved populations on-

Comment No.	Response
	site, additional patches of the plant shall be reestablished at a 3:1 ratio along appropriate boundaries of preserved oak woodland habitat areas, resulting in 0.6 acre and/or 120 individuals of restored Pismo clarkia. More than 0.6 acre of appropriate oak woodland habitat would be preserved on-site, which would provide appropriate restoration habitat for this species. In addition, Mitigation Measure BIO/mm-2.1 requires a Habitat Management Plan for Pismo clarkia to be prepared and approved by the California Department of Fish and Wildlife (CDFW) prior to any disturbance on-site. As these measures are identified in the EIR for successful restoration of Pismo clarkia, no changes to the EIR are necessary. This comment also raises concern regarding mitigation for Burton Mesa chaparral and asserts that mitigation outside of San Luis Obispo County is inadequate. Mitigation Measure BIO/mm-14.1 would ensure Burton Mesa chaparral habitat is restored at a minimum 1:1 ratio in San Luis Obispo County and any mitigation efforts outside of the county would result in restoration at a 3:1 ratio. However, as evaluated in Section 4.4., *Biological Resources*, the loss of this habitat type at the project site is identified as a Class I impact. Therefore, the evaluation of the EIR is consistent with the intent of this comment. As such, no changes in the environmental document are needed. Refer to MR-3, which provides a detailed response to comments related to Burton Mesa chaparral.
KK-20	This comment raises concern regarding the project's impacts on common wildlife species. Refer to BR-1, which addresses this comment.
KK-21	The comment raises concern regarding the alternative analysis and the lack of figures. CEQA does not require alternatives to be developed or analyzed with the same level of detail as the proposed project. The EIR describes each alternative and provides figures and tables, where appropriate. Refer to AG-4, which responds to comments related to the alternatives analysis for the proposed project.

9.5.33 Toni Destro

Received 8/1/22

Toni Destro
914 Miguel Ct. Nipomo

Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow

Dear Ms. Guetschow

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR
- Water usage – we are in a severe drought so should we be building this much at this time

TD-1

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7/25/22 SIGNED: Toni Destro
email: tdestro@earthlink.net

9.5.33.1 Response to Letter from Toni Destro

Comment No.	Response
TD-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.34 Nicole Duran

[EXT]Dana Reserve Project Concerns

Nicole Duran <4nduran@gmail.com>
Mon 7/25/2022 1:11 PM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Good afternoon,
As someone who has lived their entire life in Nipomo, I'm very concerned about this Dana Reserve Project. We are already in the middle of a drought and have had to cut back water usage and we do not have enough water for that many new households. The destruction of so much habitat for wildlife is unthinkable. Even with replanting oaks, it will not take the place of all the old growth oak trees. Just look at the oak mitigation project where they are attempting to grow oaks across the creek from the Dana Adobe, that has been in the works for years and still has very little progress. Traffic on the Tefft bridge is horrendous and driving on Willow has it's own hazards and blind corners. The roads are not setup for such a large influx of people. The social and economic benefits of this project do not outweigh the detrimental impacts this project will have.
Thank you,
A concerned citizen

NDu-1
NDu-2
NDu-3
NDu-4

9.5.34.1 Response to Letter from Nicole Duran

Comment No.	Response
NDu-1	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
Ndu-2	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
NDu-3	This comment expresses concern related to traffic congestion and hazards along Willow Road and Tefft Street. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic along Willow Road, Tefft Street, and other local roadways associated with the proposed project.
NDu-4	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.35 Jeff Ellis

July 25, 2022

Jeff Ellis
536 Pomeroy
Nipomo
mailed 7.28.22
rcvd. 8.2.22

Jennifer Guetschow
County of San Luis Obispo

Regarding: Dana Reserve Project

Ms. Geutschow,

After review of the Dana Reserve Project, I am writing you to share my concerns regarding this project. The impacts from the Dana Reserve Project will not overcome the social and economic benefits of the project.

There are numerous reasons I present these concerns to your attention. Most importantly, I am concerned about the negative impact that this development imposes on the entire community of Nipomo. Secondly, I reside at 536 Pomeroy Nipomo and am adjacent to the development.

Of top concern, our area has been in different stages of a drought for several years. The reliability of future water supply is uncertain; couple that by an increase for water demand from a significant population growth suggested by this development (4500+ people) and our area will be strangulated by even more significant water shortage and increased water prices. If this development is to serve a low-income population, how will they and the rest of the Nipomo residents be able to afford and have access to water? JEI-1

Secondly, this project is labeled for "affordable housing". With the starting price of $600,000.00, who are the developers targeting to buy these houses? Additionally, along with the price of the house, who is going to be deemed responsible for upkeep of such identified equestrian trail and parks? Will the homeowners continue to have increasing HOA fees to live within an affordable housing project? In my opinion, this does not meet any standard of "affordable housing". Will the county be responsible for the maintenance of parks and trails? How will this impact the current financial crisis of the county and/or its residents? JEI-2

Another concern is public facilities. Please address how the county is going to allow for a developer to propose parks, request a waiver of the Quimby Fees, and expect that the upkeep will be maintained adequately? The county's own parks department identified that the park would not be adequately accommodated. Additionally, our schools are at capacity. What is the plan for schools offsetting the number of children added to our local schools by this development? LMUSD has already voiced concerns about the current plan. If these houses are aimed to attract working force residents, how do you expect the residents to accommodate dropping off and picking up their children from schools on the other side of Nipomo when our streets and roads are already congested with backed up traffic? JEI-3

To continue with the concern about traffic, I am interested to know if anyone considering adopting this project, or the developer, has had the pleasure of using Tefft Street during the JEI-4

weekday morning and afternoon hours to get to the 101? How about having to grocery shop at the Vons on Sunday and have to wait extensively to get to and from the store because of the swat meet traffic? The roads identified in the project identifies roads that will need safety improvements. The plan does not offer any insight into who will be responsible for such improvements. My driveway is on the corner of Pomeroy, and one house away from Sandydale. I have lived here for 24 years and have noticed a significant increase in traffic. I have assisted many drivers out of their cars after crashing in our neighbor's yards and have also had the coroner place a body in my driveway because of a deadly accident that occurred in front of my house. Adding another 4500+ residents to this immediate area does not make any sense until our road and street infrastructure can accommodate the additional load.

JEI-4 (cont'd)

This development is not environmentally responsible for preserving oak trees and relocation of wildlife. There will be 3,948 oak trees lost with this development! Replanting of oaks outside of SLO county and/or on the Dana Ridge is not appropriate and an inadequate mitigation. In my opinion, it undermines the existing oak tree ordinance and places the entire central coast at risk of losing the oak population.

JEI-5

Lastly, I am concerned about the proposed property changing from rural residential to single or multi family residential. Despite the fact that planning commissioner charged residents to "get over" having a large development adjacent to our property, this area is used for agriculture. Along with many of our neighbors, we have livestock that is not appropriate to have in single and multifamily living areas. Perhaps creating a new community within the rural residential foundation is more appropriate.

JEI-6

As previously stated, the impacts from the Dana Reserve Project will not overcome the social and economic benefits of the project. This project will negatively impact the entire Nipomo community and I strongly oppose the project for the following reasons:

1. Water
2. Affordable housing
3. Public Facilities
4. Transportation and road safety
5. Biological impact
6. Land planning

JEI-7

Perhaps revisiting the design of the development to significantly reduce the amount of housing within the acreage will:

1. ensure adequate and affordable water,
2. ensure residents of the project can continue to afford to live there without increasing HOAs to maintain the community,
3. prevent over populating of schools and over extending an already tight county maintenance budget,
4. allow for the county to devise and implement to ensure safety within our road, street, and highway infrastructure,
5. prevent the eradication of oak trees being destroyed from the project and future projects,

JEI-8

6. avoid overpopulation by creating a plan for rural residential.

JEI-8 (cont'd)

I appreciate your time and I look forward to your input.

Kindly,

Jeff Ellis
536 Pomeroy Road
Nipomo CA 93444
(805) 266-5178
Katie.e@sbcglobal.net

9.5.35.1 Response to Letter from Jeff Ellis

Comment No.	Response
JEl-1	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
JEl-2	This comment raises concern regarding affordable housing. Refer to KK-11, which responds to comments related to affordable housing.
JEl-3	This comment raises concern regarding the increase in demand on existing public services. Refer to BR-6, which responds to comments regarding public schools; MR-2 and PH-7, which responds to comments related to police protection services; and PH-8, which responds to comments related to other public services. As evaluated in Section 4.15, *Public Services*, the project would be subject to the payment of fees to provide funding for maintenance of existing facilities and development of additional facilities. In addition, Mitigation Measure PS/mm-1.1 requires the applicant to set aside land to provide a location for future development of a new CAL FIRE station in the community. Concerns related to public services have been addressed in the EIR and mitigation has been included where appropriate to address potential impacts. The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact. No changes to the environmental document are needed.
JEl-4	This comment expresses concern related to an increase in traffic congestion as a result of the proposed project and associated population increase. Refer to DMW-1, JK-6, and JK-7, which responds to comments related to traffic congestion and implementation of improvements.
JEl-5	This comment expresses concerns related to the project's impacts related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
JEl-6	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to BR-3, which addresses comments related to a rural residential development alternative and PH-1, which addresses comments related to the project's consistency with surrounding rural areas. According to the Right-to-Farm Ordinance, pre-existing agricultural processing and other operations shall not be considered nuisances due to a change in the area surrounding the operations (Section 5.16.030 and 5.16.031). The comment does not include any specific facts or information that would indicate why the substantial analysis of this issue in the EIR lacks sufficient detail to adequately demonstrate a less-than-significant impact related to agriculture; therefore, no changes in the environmental document are necessary.
JEl-7	This comment expresses concerns related to water supply, affordable housing, public facilities, transportation and road safety, consistency with applicable planning documents, and biological resources. Refer to KK-11, which responds to comments related to affordable housing; JEl-3, which responds to comments related to public services; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
JEl-8	This comment suggests reducing the number of proposed residential dwellings. Refer to AG-3, which addresses comments related to project alternatives, including a rural residential development project alternative.

9.5.36 Kathryn Ellis

Kathryn
Ellis
536 Pomeroy
Nipomo

July 25, 2022

Jennifer Guetschow
County of San Luis Obispo

post-marked 7.28.22
received 8.2.22

Regarding: Dana Reserve Project

Ms. Geutschow,

After review of the Dana Reserve Project, I am writing you to share my concerns regarding this project. The impacts from the Dana Reserve Project will not overcome the social and economic benefits of the project.

There are numerous reasons I present these concerns to your attention. Most importantly, I am concerned about the negative impact that this development imposes on the entire community of Nipomo. Secondly, I reside at 536 Pomeroy Nipomo and am adjacent to the development.

Of top concern, our area has been in different stages of a drought for several years. The reliability of future water supply is uncertain; couple that by an increase for water demand from a significant population growth suggested by this development (4500+ people) and our area will be strangulated by even more significant water shortage and increased water prices. If this development is to serve a low-income population, how will they and the rest of the Nipomo residents be able to afford and have access to water? KE-1

Secondly, this project is labeled for "affordable housing". With the starting price of $600,000.00, who are the developers targeting to buy these houses? Additionally, along with the price of the house, who is going to be deemed responsible for upkeep of such identified equestrian trail and parks? Will the homeowners continue to have increasing HOA fees to live within an affordable housing project? In my opinion, this does not meet any standard of "affordable housing". Will the county be responsible for the maintenance of parks and trails? How will this impact the current financial crisis of the county and/or its residents? KE-2

Another concern is public facilities. Please address how the county is going to allow for a developer to propose parks, request a waiver of the Quimby Fees, and expect that the upkeep will be maintained adequately? The county's own parks department identified that the park would not be adequately accommodated. Additionally, our schools are at capacity. What is the plan for schools offsetting the number of children added to our local schools by this development? LMUSD has already voiced concerns about the current plan. If these houses are aimed to attract working force residents, how do you expect the residents to accommodate dropping off and picking up their children from schools on the other side of Nipomo when our streets and roads are already congested with backed up traffic? KE-3

To continue with the concern about traffic, I am interested to know if anyone considering adopting this project, or the developer, has had the pleasure of using Tefft Street during the KE-4

weekday morning and afternoon hours to get to the 101? How about having to grocery shop at the Vons on Sunday and have to wait extensively to get to and from the store because of the swat meet traffic? The roads identified in the project identifies roads that will need safety improvements. The plan does not offer any insight into who will be responsible for such improvements. My driveway is on the corner of Pomeroy, and one house away from Sandydale. I have lived here for 24 years and have noticed a significant increase in traffic. I have assisted many drivers out of their cars after crashing in our neighbor's yards and have also had the coroner place a body in my driveway because of a deadly accident that occurred in front of my house. Adding another 4500+ residents to this immediate area does not make any sense until our road and street infrastructure can accommodate the additional load.

KE-4 (cont'd)

This development is not environmentally responsible for preserving oak trees and relocation of wildlife. There will be 3,948 oak trees lost with this development! Replanting of oaks outside of SLO county and/or on the Dana Ridge is not appropriate and an inadequate mitigation. In my opinion, it undermines the existing oak tree ordinance and places the entire central coast at risk of losing the oak population.

KE-5

Lastly, I am concerned about the proposed property changing from rural residential to single or multi family residential. Despite the fact that planning commissioner charged residents to "get over" having a large development adjacent to our property, this area is used for agriculture. Along with many of our neighbors, we have livestock that is not appropriate to have in single and multifamily living areas. Perhaps creating a new community within the rural residential foundation is more appropriate.

KE-6

As previously stated, the impacts from the Dana Reserve Project will not overcome the social and economic benefits of the project. This project will negatively impact the entire Nipomo community and I strongly oppose the project for the following reasons:

1. Water
2. Affordable housing
3. Public Facilities
4. Transportation and road safety
5. Biological impact
6. Land planning

KE-7

Perhaps revisiting the design of the development to significantly reduce the amount of housing within the acreage will:

1. ensure adequate and affordable water,
2. ensure residents of the project can continue to afford to live there without increasing HOAs to maintain the community,
3. prevent over populating of schools and over extending an already tight county maintenance budget,
4. allow for the county to devise and implement to ensure safety within our road, street, and highway infrastructure,
5. prevent the eradication of oak trees being destroyed from the project and future projects,

KE-8

6. avoid overpopulation by creating a plan for rural residential.

KE-8 (cont'd)

I appreciate your time and I look forward to your input.

Kindly,

Kathryn Ellis
536 Pomeroy Road
Nipomo CA 93444
(805) 266-5178
Katie.e@sbcglobal.net

9.5.36.1 Response to Letter from Kathryn Ellis

Comment No.	Response
KE-1	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
KE-2	This comment raises concern regarding affordable housing. Refer to KK-11, which responds to comments related to affordable housing.
KE-3	This comment raises concern regarding the increase in demand on existing public services. Refer to BR-6, which responds to comments regarding public schools; MR-2 and PH-7, which responds to comments related to fire and police protection services; and PH-8, which responds to comments related to other public services.
KE-4	This comment expresses concern related to an increase in traffic congestion as a result of the proposed project and associated population increase. Refer to DMW-1, JK-6, and JK-7, which responds to comments related to traffic congestion and implementation of improvements.
KE-5	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
KE-6	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and BR-3, which addresses comments related to a rural residential development alternative and JEl-6, which addresses this comment.
KE-7	This comment expresses concerns related to water supply, affordable housing, public facilities, transportation and road safety, consistency with applicable planning documents, and biological resources. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply, KK-11, which responds to comments related to affordable housing; Jel-3, which responds to comments related to public services; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
KE-8	This comment suggests reducing the number of proposed residential dwellings. Refer to AG-3, which addresses comments related to project alternatives, including a rural residential development project alternative.

9.5.37 Joyce Hartwig

Joyce Hartwig

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issue of concern (i.e Water.

JoH-1

* all issues are a concern for this project !!

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: July 25, 2022
SIGNED: Joyce Hartwig
email: hartwighome@att.net

JoH-1
(cont'd)

9.5.37.1 Response to Letter from Joyce Hartwig

Comment No.	Response
JoH-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; Gro-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.38 Melissa and Jack Peterson

[EXT]Dana Reserve Project

Melissa Peterson <mlssap@live.com>
Mon 7/25/2022 2:05 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Melissa and Jack Peterson
850 Sandydale Drive
Nipomo CA 93444

July 25, 2022

Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, Ca 93408
jguetschow@co.slo.ca.us

RE: Dana Reserve Project

Dear Ms Guetschow,

As residents of Nipomo for the past 12 1/2 years, we would like to express some of our concerns regarding the proposed Dana Reserve Project. We moved to Nipomo because it has a small town feel with numerous agricultural and rural properties. The added subdivision will make our small town feel more like a typical city in Southern California. MJP-1

Our home is on Sandydale Drive and the Dana Reserve project will impact us considerably due to an increase in traffic. With increased traffic comes increased air and noise pollution. MJP-1

We are also very concerned with the number of homes proposed and the amount of water that will be required to take care of the families living there. As it is, our water rates have gone up considerably since we moved here and that trend promises to continue. We are encouraged to conserve water and yet apparently, the Planning Commission sees no problem with adding over 1200 new living spaces and increasing the Nipomo population by roughly 20%, all which means more water consumption. Nipomo does not have the infrastructure in place to accommodate this project. MJP-2

The impacts from the Dana Reserve Project will not overcome the social and economic so-called benefits of the project and we would like to see a much more modest proposal for the property, one that respects more open space and its many oak trees. Coastal Live Oak trees take up to 75 years to reach maturity and can live for up to 250 years. The proposed removal of more than 3500 of these majestic trees is beyond comprehension. We feel this project, if it goes ahead as planned, will destroy the charm and warmth of Nipomo. MJP-3

Sincerely,

Melissa Peterson
Jack Peterson

Melissa Peterson, mlssap@live.com
Jack Peterson, K6dmm@live.com

cc: Lynn Compton, County Board of Supervisor
district4@co.slo.ca.us

9.5.38.1 Response to Letter from Melissa and Jack Peterson

Comment No.	Response
MJP-1	This comment raises concern regarding the density of the proposed development and associated increase in traffic congestion, noise, and air pollution. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. Therefore, no changes to the environmental document are needed.
MJP-2	This comment expresses concern related to the available water supply for the population projections associated with the DRSP. Refer to MR-1 and GRe-1 through GRe-4, which addresses this comment.
MJP-3	This project raises concerns related to social and economic impacts in addition to concern related to the loss of trees at the site. Refer to CE-3, which addresses comments related to social and economic impacts and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. Additionally, refer to AG-3 and JK-5, which responds to comments regarding an alternative layout for the proposed project intended to reduce impacts to oak trees at the project site.

9.5.39 Sue Shaleen

[EXT]Commissioner Don C

sue <suequilting@gmail.com>
Mon 7/25/2022 9:13 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

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Jennifer, I would like to say to the head of the planning commission that Commissioner Don Cambel . should be removed from the Dana Reserve Development panel. My issue is the last meeting, I reviewed the tape, he stated he went to lunch the day before the meeting with the developer who has been a close friend for over 30 years. This seems like a major conflict of interest. Also, he stated the land has never been used for algaculture and cattle purposes . This shows he doesn't have information about Nipomo and its history. As I write this there are cattle NOW on the Dana Reserve grazing. Maybe he should have had lunch in Nipomo? **SSh(2)-1**

Sent from Mail for Windows

9.5.39.1 Response to Letter from Sue Shaleen

Comment No.	Response
SSh(2)-1	This comment raises concern regarding a potential conflict of interest regarding the planning commission and the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.40 Betty Sleeth

[EXT]Dana Reserve Preserve DEIR

Betty Sleeth <bettysleeth@me.com>
Mon 7/25/2022 2:38 PM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a building project that will develop 288 acres in the Unincorporated County Community of Nipomo. The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project.

Draft Environmental Impact Report (DEIR) Comments:

1. It is difficult to understand any of the alternative project plans without visuals. Alternative 1 and 3 are the only alternatives to have a visual representation. Alternative 2, 4, and 5 are described but no visual of housing location is provided. This makes comparison to the original proposed project map challenging for the layperson to understand. **BSI-1**
2. None of the biological surveys were done during the overwintering months for monarchs. The only survey done during this period was on January 20th for birds and badgers. The DEIR states that "The Nipomo Mesa is largely under-surveyed for monarch butterfly aggregation sites because most of the land is privately owned." It is also documented in the DEIR that monarchs do aggregate, although less commonly, "in oak trees." (CDFW 2021a) DEIR 4.4-25 During the winter months on Sandydale, numerous monarch butterflies can be found looking for nectar in yards. Neighbors near Highway 101 on Sandydale/Briarwood have reported clusters there. Are the monarchs also in the oaks on the proposed development? How do we know they are not? One of the primary drivers affecting the health of the monarch population as stated by The US Fish and Wildlife SSA (Species Status Assessment) of September 2020 is "incompatible management of overwintering sites in California," **BSI-2**
3. In section 4.4.1.2.6 Special-Status Wildlife Species it states that the "adjacency of the North Frontage Road Extension Parcel to the Specific Plan Area, the CNDDB search conducted for the Specific Plan Area applies to the extension parcel. The eucalyptus trees provide potential for……roosting monarch butterflies." I again point out that monarchs would only be found roosting there October through March and the DEIR was not conducted during this time frame. Are we again mismanaging an overwintering site at a time when we need to be preserving it? The very least we can do is survey during an appropriate time frame for this beleaguered but much loved insect. **BSI-3**
4. 4.4-33 again states that North Oakglen Avenue, "which is lined with coast live oak trees and large eucalyptus trees…could potentially provide suitable habitat for monarch butterflies." This applies to the proposed waterline extension area. See my comments regarding overwintering monarchs in point 2 and 3 above. **BSI-4**
5. BIO Impact 18 (Class 1) BIO/mm-18.4 pg 4.4-92 The Applicant Proposed Mitigation is 187 acres on the Dana Ridge Ranch. "A Conservation easement over the protected habitat shall be controlled by a qualified conservation organization approved by the County of San Luis Obispo." Has the applicant met and talked with the board of the Dana Adobe and offered them the opportunity to be the "conservation organization?" This small non-profit does not have the financial support, training, expertise, or staff to manage additional land, especially land that is not contiguous to its current property. What are the specific requirements to be a "qualified conservation organization?" **BSI-5**

General Comments:
Additionally, more alternatives including a reduction in the overall neighborhood clusters should be assessed. Public comment on July 14th has shown that there are concerns with the project from the community of Nipomo. Alternatives in the EIR and additional alternatives not assessed, would take into account the concerns of the Nipomo community which include a project with less units, which would reduce the overall traffic and jobs/housing imbalance identified in the EIR, more buffer room between high density housing and rural homes on the perimeter of the project to account for **BSI-6**

future conflicts between land uses, and protection of more native oak trees onsite, which in turn would lessen the overall biological and aesthetic impacts on the rural character of the area.

BSI-6 (cont'd)

I took offense to comments made by Don Campbell (District 5) during the July 14th public meeting. In this meeting he made comments that neighbors with 1+ acre lots adjacent should "get over" (having high density houses immediately behind their lots), stated that the project "is not AG land" and then made comments about having met with the developer to discuss the project and had known said developer for 30 years. I do not think that Don Campbell comes off as unbiased, which was what was asked by the land planning manager at the beginning of the meeting. Additionally, there are real concerns from neighbors on these lots when the zoning for the neighboring property is proposed to be changed from Rural Residential (RR) to Single Family (SFR) or Multi Family Residential (MFR) zoning. Neighbors adjacent to this project have roosters, chickens, horses and cattle, despite Don's comments that this area "is not AG", they are allowed these animals in certain densities on their land. Unfortunately, new families moving into these SFR and MFR lots will not be so understanding of these animals. In many cases, the only space between these lots is a 15 ft setback with an equestrian trail. Although this equestrian trail is an amenity of the project, the buffer will not be enough to prevent the future conflicts that will occur between these lots with drastically different zoning on the other side.

BSI-7

What organization is in place to monitor the proposed mitigation acreage? Although the Dana Adobe non-profit meets the qualification for the historical sales pitch by the applicant, the Dana Adobe Amigos organization is a small non-profit with no formal conservation training or expertise. What are the specific requirements to be a "qualified conservation organization?"

BSI-8

As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

BSI-9

Respectfully submitted,

Betty Sleeth
bettysleeth@mac.com

9.5.40.1 Response to Letter from Betty Sleeth

Comment No.	Response
BSl-1	The comment raises concern regarding the alternative analysis and the lack of figures. CEQA does not require alternatives to be designed or analyzed to the same level of detail as the proposed project. Refer to KK-21, which addresses this comment.
BSl-2	This comment raises concern over the project's impacts on monarch butterflies and asserts that no surveys were conducted for this species during the overwintering period. As described in Table 4.4-2 in Section 4.4., *Biological Resources*, of the DRSP EIR, multiple surveys were conducted at the project site throughout the year between 2017 and 2021. While the eucalyptus grove and oak woodland has potential to provide marginally suitable habitat for this species, monarch butterfly is not documented to overwinter at this location; therefore, no species-specific surveys were conducted. Additionally, the project would remove two isolated eucalyptus trees but does not include the removal of the eucalyptus grove; therefore, direct impacts to monarch butterfly are not anticipated. Mitigation Measure BIO/mm-5.1 has been identified to further reduce impacts by requiring avoidance of this area during the overwintering season (late October through February). If this is not possible, the measure requires focused preconstruction surveys of the potentially suitable habitat to ensure no monarch butterfly individuals are present. If detected, this measure requires development to be postponed until the overwintering period is over. In addition, Mitigation Measure BIO/mm-1.1 through BIO/mm-1.6 have been included to reduce impacts to monarch butterflies and associated habitat. Implementation of the identified mitigation would ensure the project does not adversely affect this species during construction activities. Therefore, this comment does not require any change to the environmental document.
BSl-3	This comment raises concern over the project's impacts on monarch butterflies. Refer to BSl-2, which addresses comments related to monarch butterfly.
BSl-4	This comment raises concern over the project's impacts on monarch butterflies. Refer to BSl-2, which addresses comments related to monarch butterfly.
BSl-5	This comment raises concern regarding mitigation for the loss of oak trees and suggests coordination with the board of the Dana Adobe regarding the proposed conservation easement. Refer to MR-3, which addresses comments related to the loss of oak trees. As identified in Mitigation Measure BIO/mm-15.1, a conservation easement over protected habitat shall be controlled by a qualified conservation organization approved by the County of San Luis Obispo. Potential conservation organizations include, but are not limited to, The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, Cambria Land Trust, or the California Department of Fish and Wildlife. The County of San Luis Obispo is responsible for initiating and monitoring coordination efforts. Therefore, this comment does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
BSl-6	This comment asserts alternatives related to the reduction of residential units should be explored. Refer to AG-3 and AG-4, which responds to comments related to the alternatives analysis.
BSl-7	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and AG-4, which addresses comments related to project alternatives and JEl-6, which addresses this comment.
BSl-8	This comment requests clarity regarding the organization in place to monitor the off-site mitigation area. Refer to BSl-5, which addresses this comment.
BSl-9	This comment suggests denial of this project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.41 Greg and Pamela Sturgeon

[EXT]Dana Reserve Project Concerns DEIR

Greg Sturgeon <blue-skies@charter.net>
Mon 7/25/2022 10:13 AM

To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Cc: District 4 <district4@co.slo.ca.us>

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Jennifer Guetschow

Department of Planning and Building

County of San Luis Obispo California

Re Dana Reserve Project Concerns DEIR

Biological Resources:

The removal of thousands of mature oak trees is an absolute disaster. The county has a tree ordinance for a reason, and it needs to be applied in this situation. Why have it just so a developer can come along buy a parcel on a hill to mitigate the loss of thousands of mature oaks. Not acceptable. GPS-1

Land Planning:

There seems to be some improprieties, although subtle, in the comment made by Planning Commissioner Campbell regarding his having known the developer Mr. Tompkins for over 30 years. Having known Mr. Tompkins for any amount of time should be deemed biased and he be removed from this decision making process for the duration. His comment that houses on acreage surrounding the project should "get over" having high density housing immediately adjacent to their properties during the EIR public meeting. Although the equestrian trail is an amenity of the project the proposed buffer will not be enough to prevent future conflicts from one side of the "trail" to the other. We need to see a redesigned development plan that will drastically reduce the housing on the perimeter of the development in order to avoid future conflicts. GPS-2

Water:

This is a fluid situation. The state of California is in a drought situation and it is getting worse by the year. We, the residents of Nipomo, are already being asked to conserve and it is only going to get worse until we see significant rain. The fact that NCSD made a bad deal years ago by not connecting to state water and we have to "use it or lose" it is an argument that just can't be won. Put the water in the aquafer for future use for the residents and farms that already exist in Nipomo. The water the developer is counting on may not be there in the second, third or even first phase of this project. If a new development in a water parched area is approved all water saving measures at our disposal should be utilized. A waste water recycling line plan to supplement water resources was not developed for this project as it should have been. GPS-3

Public Facilities:

The EIR states that Nipomo High School is already full and the completion of this project would further contribute to the excess of students at the high school and the traffic getting them there. Dorthea Lange is the elementary school that the future children from this project would attend. When that facility gets full these children will have to go over to Nipomo Elementary. Lucia Mar has concerns about this project but the mitigated FEES are acceptable? Money instead of the safety of their students? Not acceptable. GPS-4

Affordable Housing: GPS-5

Since when did $600 thousand become affordable housing? Along with HOA fees? That goes up for ever. This is not affordable housing. Don't call it such. GPS-5 (cont'd)

Transportation:

The increase in traffic from this development will cause huge backups on Mary and Tefft streets and both north and sound bound off ramps as all of the Nipomo amenities are accessed by using Tefft Street. Adding 4500+ new people and who knows how many cars to this one intersection is a Public Safety concern. Nipomo is not a walking town or a safe bike riding town. Development of those amenities should be discussed if you are going to add 4500+ new people. Pomeroy is a thoroughfare to get from one side of town to the other. One street? There has been a fatal crash on Pomeroy in the middle of the day. The increase of traffic on Pomeroy will be very dangerous for those living on Sandydale and other attached streets. Sandydale has a large cement island in the middle for no reason. When walking on that end of the street and a car is coming you have to climb a dirt mound to get out of the way. CALTRANS has deemed that our area is too rural for improvements on this section of the highway. No help from them. Too Bad Nipomo! Listen to them! Too rural for this large of a development! GPS-6

Having lived in Nipomo in the same house for 36 years we have enjoyed some "progress" we would be lying if we said otherwise. The Dana Reserve Project is not a change we are willing to accept as is. We see no social/economic benefits to this plan. The demise of Nipomo is all we can see.

Send this project back for the development of more alternatives like 5 acre ranchettes or rural residential property as is the surrounding properties. GPS-7

Repectfully

Greg & Pamela Sturgeon

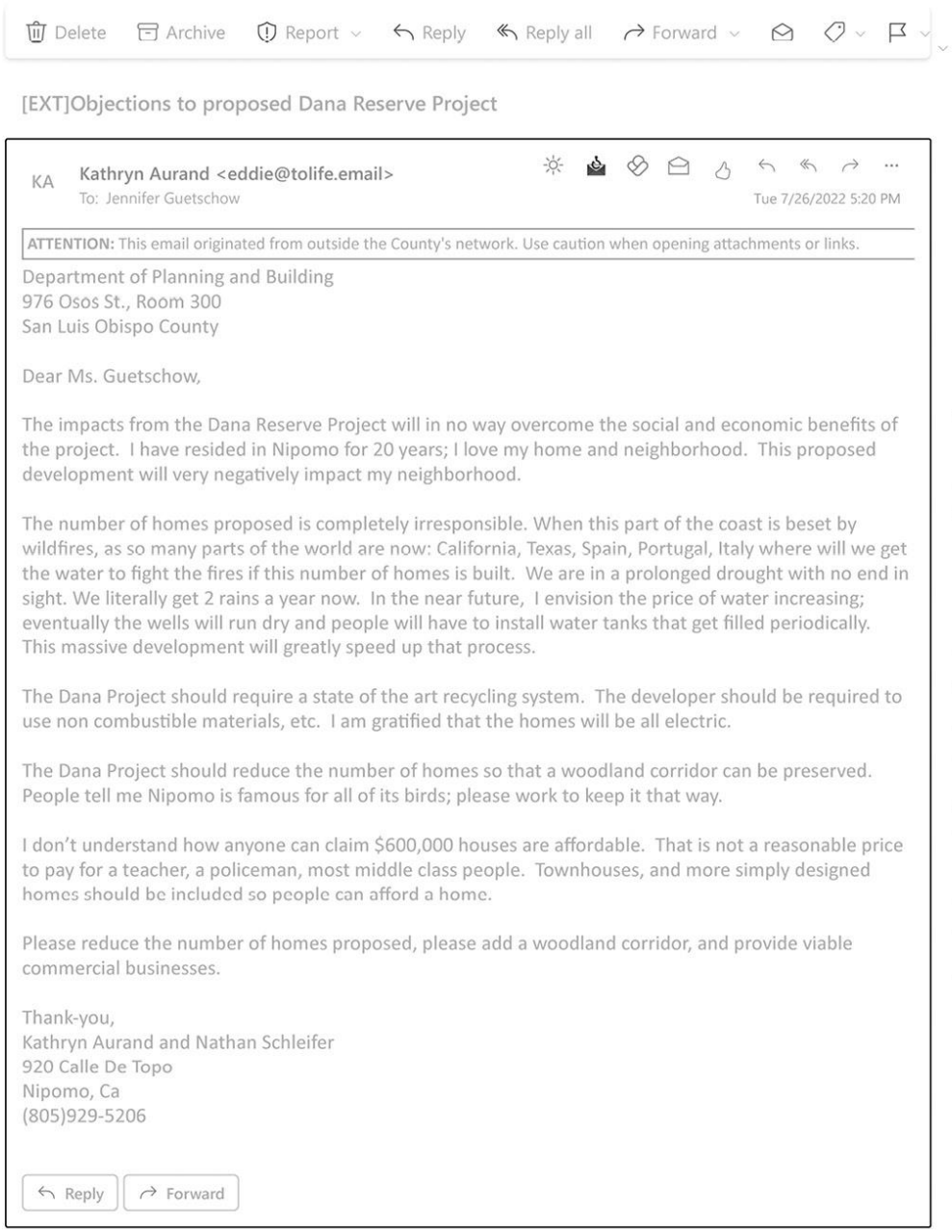
blue-skies@charter.net

July 26, 2022

9.5.41.1 Response to Letter from Greg and Pamela Sturgeon

Comment No.	Response
GPS-1	This comment asserts that the proposed project is inconsistent with the County's Oak Woodland Ordinance due to the removal of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site. In addition, refer to ES-3, which addresses comments related to applicable planning policies.
GPS-2	This comment raises concern regarding a potential conflict of interest regarding the planning commission and the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
GPS-3	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
GPS-4	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.
GPS-5	This comment raises concern regarding affordable housing. Refer to KK-11, which addresses this comment.
GPS-6	This comment expresses concern related to traffic congestion along Willow Road and Pomeroy Road. Refer to DMW-1 and JK-6 and JK-7, which addresses comments related to an increase in traffic along Willow Road, Tefft Street, and other local roadways associated with the proposed project.
GPS-7	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.42 Kathryn Aurand and Nathan Schleifer



Delete Archive Report Reply Reply all Forward

[EXT]Objections to proposed Dana Reserve Project

KA Kathryn Aurand <eddie@tolife.email>
To: Jennifer Guetschow
Tue 7/26/2022 5:20 PM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Department of Planning and Building
976 Osos St., Room 300
San Luis Obispo County

Dear Ms. Guetschow,

The impacts from the Dana Reserve Project will in no way overcome the social and economic benefits of the project. I have resided in Nipomo for 20 years; I love my home and neighborhood. This proposed development will very negatively impact my neighborhood. **KANS-1**

The number of homes proposed is completely irresponsible. When this part of the coast is beset by wildfires, as so many parts of the world are now: California, Texas, Spain, Portugal, Italy where will we get the water to fight the fires if this number of homes is built. We are in a prolonged drought with no end in sight. We literally get 2 rains a year now. In the near future, I envision the price of water increasing; eventually the wells will run dry and people will have to install water tanks that get filled periodically. This massive development will greatly speed up that process. **KANS-2**

The Dana Project should require a state of the art recycling system. The developer should be required to use non combustible materials, etc. I am gratified that the homes will be all electric. **KANS-3**

The Dana Project should reduce the number of homes so that a woodland corridor can be preserved. People tell me Nipomo is famous for all of its birds; please work to keep it that way. **KANS-4**

I don't understand how anyone can claim $600,000 houses are affordable. That is not a reasonable price to pay for a teacher, a policeman, most middle class people. Townhouses, and more simply designed homes should be included so people can afford a home. **KANS-5**

Please reduce the number of homes proposed, please add a woodland corridor, and provide viable commercial businesses. **KANS-6**

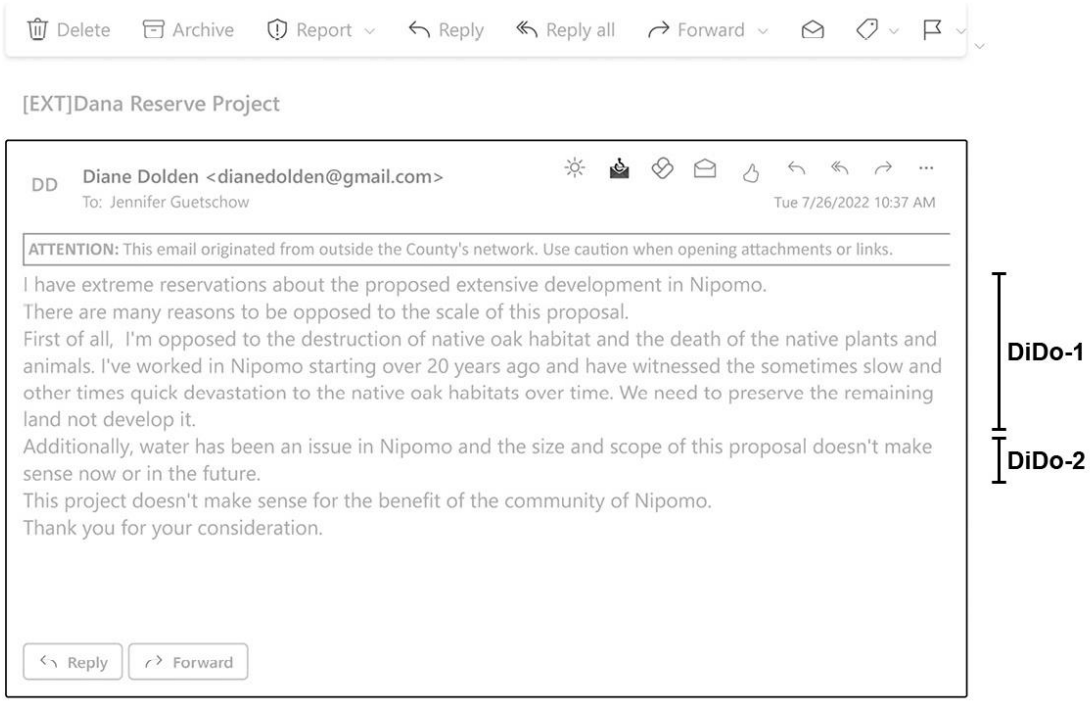
Thank-you,
Kathryn Aurand and Nathan Schleifer
920 Calle De Topo
Nipomo, Ca
(805)929-5206

Reply Forward

9.5.42.1 Response to Letter from Kathryn Aurand and Nathan Schleifer

Comment No.	Response
KANS-1	This comment raises concern regarding neighborhood compatibility. Refer to PH-1, which addresses comments related to neighborhood compatibility.
KANS-2	This comment raises concern regarding the proposed number of homes, drought, and wildfire. Refer to BR-3, which addresses comments related to a rural residential development project alternative; MR-1 and GRe-1 through GRe-4, which responds to comments related to the availability during normal, single-dry, and multiple-dry year conditions; and BR-1, which addresses comments related to wildfire.
KANS-3	This comment suggests that the developer uses non-combustible materials and expresses support for the development of all-electric houses. This comment does not require any revisions to the EIR.
KANS-4	This comment suggests reducing the number of homes to reduce impacts to oak woodlands and trees. Refer to BR-3 and AG-3, which responds to project impacts related to a reduction in the number of homes associated with the proposed project and to MR-3, JK-4, and BR-1, which addresses comments related to biological resources, including loss of oaks and impacts to wildlife.
KANS-5	This comment raises concern regarding the affordability of the proposed affordable homes. Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the impacts would have a negative impact on the physical environment, or if the impacts would result in growth-inducing impacts. As such, no changes in the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
KANS-6	This comment requests that the number of homes is reduced, a woodland corridor is provided, and viable commercial businesses are developed. This comment does not require revisions to the EIR.

9.5.43 Diane Dolden



9.5.43.1 Response to Letter from Diane Dolden

Comment No.	Response
DiDo-1	This comment raises concern regarding the loss of oak woodland, native plants, and wildlife. Refer to MR-3, JK-4, and BR-1, which addresses comments related to biological resources, including loss of oaks and impacts to plants and wildlife.
DiDo-2	This comment raises concern regarding the availability of water within the community. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to the availability during normal, single-dry, and multiple-dry year conditions.

9.5.44 Elaine Von Achen

To: SLO Planning Commission re Dana Reserve Project: SLO Planning Commission c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo. After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

EVA-1

- Nipomo's infrastructure is not sufficient to handle the increase in traffic and population that this project will impose on the surrounding community. EVA-2
- Areas of Nipomo are currently on water restriction. This can only negatively impact the already limited supply. EVA-3
- I am local, 5th generation, and have lived in this house for 44 years directly across the street from the project, removal of these old oaks will break my heart. EVA-4

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. EVA-5

DATE: _7.26.2022_
SIGNED: Elaine Von Achen
email: _elainevonachen@hotmail.com_

Signature: Elaine Von Achen
(Elaine Von Achen (Jul 26, 2022 14:30 PDT))

Email: elainevonachen@hotmail.com

9.5.44.1 Response to Letter from Elaine Von Achen

Comment No.	Response
EVA-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, and biological resources. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
EVA-2	This comment expresses concern related to traffic congestion associated with the proposed population increase. Refer to JK-6, JK-7, and DMW-1, which ~~addresses~~address comments related to an increase in traffic associated with the proposed project. Additionally, refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
EVA-3	This comment raises concern regarding the availability of water supply for the proposed project in addition to the existing community. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
EVA-4	This comment expresses concerns related to the loss of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
EVA-5	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.45 J Ahler

1786 Trilogy Pkwy

Ahler

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

JA-1

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7/27/2022 SIGNED: J Ahler
email: jlmahler1947@gmail.com

*copy this letter into your word processing program.
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408 MUST BE RECEIVED BY AUGUST 1

9.5.45.1 Response to Letter from J Ahler

Comment No.	Response
JA-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.46 David Biklen

Jennifer Guetschow

From: david biklen <davidbiklen@yahoo.com>
Sent: Wednesday, July 27, 2022 10:23 PM
To: Jennifer Guetschow
Subject: [EXT]Against further Nipomo development

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

WATER- where dos it come from- Makes NO SENSE

DBi-1

1

9.5.46.1 Response to Letter from David Biklen

Comment No.	Response
DBi-1	This comment raises concern regarding the availability of water supply for the proposed project in addition to the existing community. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.47 Susan Duran

Jennifer Guetschow

From: togfrog@aol.com
Sent: Wednesday, July 27, 2022 9:02 PM
To: Jennifer Guetschow
Cc: togfrog@aol.com
Subject: [EXT]Dana Reserve Plan

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To County of San Luis Obispo,

I am writing this letter because I am against this plan (Dana Reserve). I, as a tax payer and property owner for the last 42 years here in Nipomo, feel that this is not a good plan. There is definitely not enough water to be building this many homes. We have had to cut back to watering only 2 days a week on our property and they have invoked surcharges if we go over a very small amount. We have no grass on one and a half acres and we still had a surcharge this month. If you read the news you would be aware that the whole west is in a drought. Look at Lake Mead, Lake Powell, Shasta Lake, Trinity Lake, Lake Orville, and even the Great Salt Lake in Utah. Open your eyes. No large building plans should be allowed at this time. SD-1

The area they want to put small lots on if allowed should only be 1 acre home sites or 5 acre home sites.
This plan will have a negative impact on our schools, our grade schools and High school are at capacity. It will also cause more traffic problems. SD-2

Environmentally, it's horrible that they would allowed to take out over 3,000 trees. Most of these trees are over 100 yrs old. There is no replacing oaks this old. That was proven on the 100 acre property across from the Dana Adobe. As a Dana docent in the past I have watched the replanting of seedling oaks that have failed in the last 20 years. They have replanted these tree and watered and protected these tree and they are failing again. The trees on the Dana Reserve are enjoyed every day by thousands of commuters on Hwy 101. If they think the trees on the other side of the Temetate Ridge will be enjoyed by the public that is false. SD-3

We don't have the infrastructure or the services to provide for these homes and over 4,000 new residents here in Nipomo. SD-4

Please vote No on allowing this Plan.
Thank you,
Susan Duran
934 Division
Nipomo, Ca

1

9.5.47.1 Response to Letter from Susan Duran

Comment No.	Response
SD-1	This comment raises concern regarding the availability of water supply for the proposed project in addition to the existing community. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
SD-2	This comment suggests reducing the number of proposed residential dwellings. Refer to BR-3, which addresses comments related to a rural residential development project alternative.
SD-3	This comment expresses concerns related to the loss of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
SD-4	This comment raises concern over infrastructure and services to provide for the proposed project. Refer to KE-3, which responds to comments related to public services. Additionally, as described in Chapter 2, *Project Description*, of the EIR, the project includes the implementation of off-site water, wastewater, and transportation improvements necessary to support growth associated with the proposed project. Therefore, no changes to the environmental document are needed.

9.5.48 Darcia Foose

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- (•) Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) **DaF-1**
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR **DaF-2**

noise from road behind my home

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. **DaF-3**

DATE: 7/27/2022 SIGNED: Darcia Foose
email: 76darcia@gmail.com

Darcia Foose
Nipomo Resident

9.5.48.1 Response to Letter from Darcia Foose

Comment No.	Response
DaF-1	This comment raises concern regarding consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
DaF-2	This comment raises concern regarding an increase in noise. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. As this issue is addressed in the EIR, no revisions to the environmental document are required.
DaF-3	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.49 Richard Foose

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- (Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) **RF-1**
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR **RF-2**

Too Dense. Moving trees/removing = kills trees

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. **RF-3**

DATE: 7/27/2022 SIGNED: Richard Foose
email: coolpainterdad@gmail.com

Richard Foose

Nipomo Resident

9.5.49.1 Response to Letter from Richard Foose

Comment No.	Response
RF-1	This comment raises concern regarding consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
RF-2	This comment raises concern regarding the removal of oak trees. Refer to MR-3, JK-4, and BR-1, which addresses comments related to biological resources, including loss of oaks.
RF-3	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.50 Sandy Garcia

Jennifer Guetschow

From: Sandy Garcia <sgarcia.skg@gmail.com>
Sent: Wednesday, July 27, 2022 11:35 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Housing

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I OPPOSE the Dana Housing proposal. We do not have enough water to support a new development. Also, Nipomo doesn't have the Infrastructure to support this large increase in population. I live south of Tefft and already have difficulty accessing the freeway to go north on 101 for work. During the weekends the traffic is so bad it's challenging to shop locally in Nipomo. It's easier to drive south to Santa Maria, but then I'm not able to support local business. Please preserve Nipomo and not make it unlivable due to overcrowding. SG-1

Sandy Garcia
718 January St, Nipomo, CA 93444

1

9.5.50.1 Response to Letter from Sandy Garcia

Comment No.	Response
SG-1	This comment expresses concerns related to growth associated with the proposed project and an associated increase in traffic congestion. Refer to BR-2, which addresses comments related to population growth and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion, hazards, and implementation of improvements.

9.5.51 B.K. Richard

Notes On Dana Preserve Draft EIR

B.K. Richard, July 27
, 2022

The following are some summary comments, from having browsed the Draft EIR. They concentrate on the overall density and design of the project and not on the specifics of the long list of Class I impacts. My plan is to look at each of these in the next week or so.

1. The primary project and the Applicant Preferred Alternative are almost indistinguishable, in spite of the long list of Class I impacts. There is no sense of any effort to compromise on the approach. This is evident when looking at the two graphics side by side (next page). BKR-1

2. There should be maps of each of the Alternatives. Summary statistics would also help understand the relationships between Alternatives and impacts. BKR-2

3. The Burton Mesa Chaparral Avoidance and the Alternative 4 ("Development on Non-Native Grassland) are disingenuously posed. The compression of development is extreme and the visual impact, in particular, is not creatively dealt with. This Alterative seems blatantly designed to be rejected. The **scatter plot** shows where to look for an alternative that might work. It's hard to imagine how a creative company like RRM couldn't find an alternative in this space, if motivated to do so and given a little more flexibility BKR-3

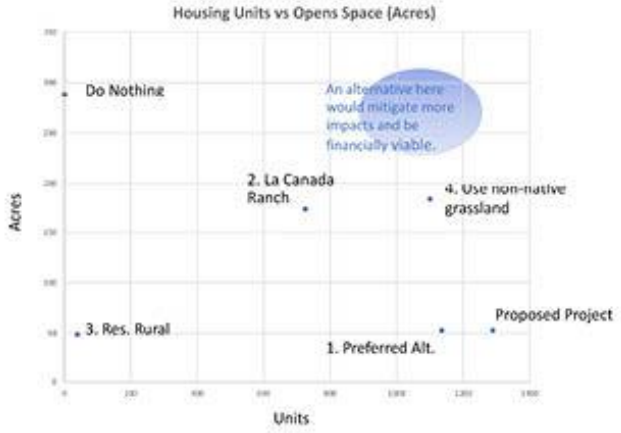




Figure 2-9. DRSP Proposed Conceptual Master Development Plan.



Figure 5-3. Alternative 1 conceptual master plan.

BKR-3

4. Frontage road North Frontage Road through APN 091-325-022. The County has no formal community separator goals, but it would make sense to route this road away from US 101 into the project to enable some form of mitigation (e.g. a berm (see next point)) to reduce visual impacts. See how this was done at Pleasant Valley Fields in Camarillo. See OS 4.2 in the COSE. BKR-4

5. I've created my own version of Alternative 4 (4B, next page). This is a crude Photoshop effort, but I think it provides some idea of what might be possible or what might be considered.
   The idea is to concentrate development along the eastern side of the project, leaving most of the oaks alone, while mitigating the visual issues associated cited in the review. The key changes include:
   a. Putting a buffer for US 101 ("bermed" for visual and noiseisolation) on the east side.
   b. Adding a trail for nature/recreation. Developer should get credit for this as (long, skinny) recreation space with other neighborhood access. This could become Nipomo's "Central Park" or "Pismo Preserve".
   c. Compensating for the loss of space near the freeway with some impacts to woodland.
   d. Rerouting the frontage road away from the freeway for more isolation.
   e. Use of some commercial space for co-located housing (mixed use)
   f. Potential use of basins for some recreation.

   BKR-5

6. The offsite piece seems irrelevant. It would seem that this parcel would have very limited development without conservation. And it doesn't seem suitable for any scaled effort in planting oaks. Given the scale of the Dana Preserve it might be a great time to apply a key idea from the COSE dealing with Land Banking[1]. This project would be a great place to start a bank with a contribution of dollars for mitigation instead of the offsite land. BKR-6

7. Impacts should be quantified. Language like "less" or "more" is vague when quantitative estimates could be applied. MTCO2e numbers are a good example. They should be estimated for each Alternative. BKR-7

8. It would seen that a lot more could be done for affordable housing. We'll stay perpetually behind if we don't take more aggressive goals in this area. 75 units is BKR-8

[1] Implementation Strategy COSE-2 Conservation and Open Space Mitigation Program Within one year of adoption of this Element, conduct a feasibility study of a Conservation and Open Space Mitigation Program that would establish an in-lieu fee, mitigation program, open space district, and/or land bank to offset or mitigate potential development project impacts to the environmental resources identified in this Element, including cumulative impacts. The feasibility study should consider use of a land bank concept for a variety of open space purposes. The feasibility study shall evaluate the use of in-lieu or mitigation fees for implementation of this Element, consistent with AB 1600. Develop and implement the Program based on the findings of the feasibility study.

generous, but I think far more could be done, potentially giving the project a higher total unit ceiling to enable this type of construction.

BKR-8 (cont'd)

Burton Mesa Altenative (like Alternative 4)

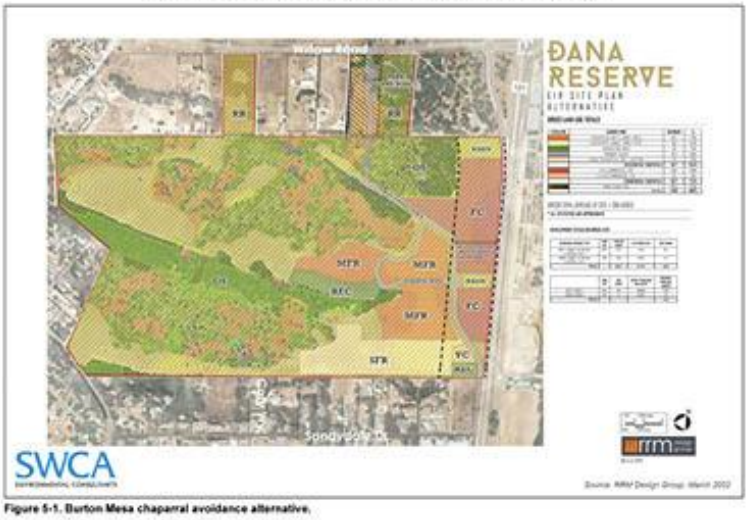


Figure 5-1. Burton Mesa chaparral avoidance alternative.

"Alternative 4B" (described in the text, item 5)

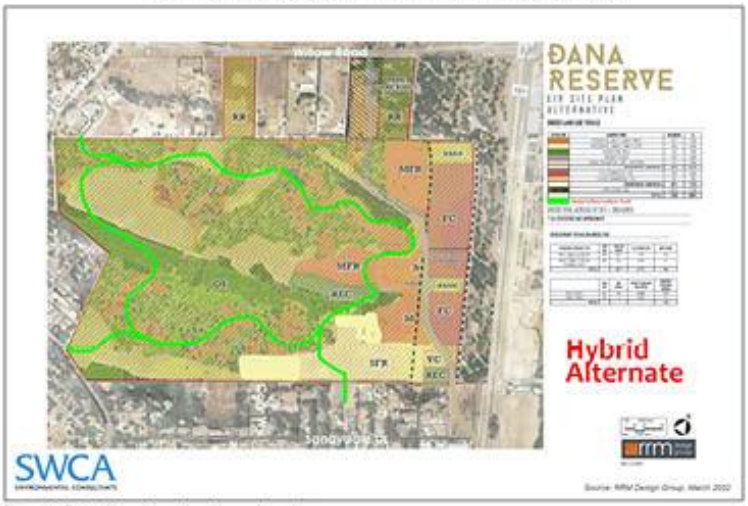


Figure 5-1. Burton Mesa chaparral avoidance alternative.

BKR-9

9.5.51.1 Response to Letter from B.K. Richard

Comment No.	Response
BKR-1	This comment expresses concern related to the Applicant Preferred Alternative. Refer to AG-3 and AG-4, which addresses comment related to the alternatives analysis.
BKR-2	This comment expresses the need for figures throughout the alternatives analysis. Refer to KK-21, which responds to this comment.
BKR-3	This comment expresses concern related to the alternatives analysis, including the Burton Mesa Chaparral Avoidance alternative. Refer to MR-3, AG-3, and AG-4, which addresses comment related to the alternatives analysis and Burton Mesa chaparral.
BKR-4	This comment suggests routing North Frontage Road away from US 101 to alleviate visual impacts. Implementation of proposed roads ~~are~~is necessary to satisfy County Public Works requirements and reduce existing vehicle congestion. In addition, the EIR identifies a Class I impact related to aesthetics, and this measure would not reduce identified Class I impacts. Therefore, this comment does not require any change to the environmental document.
BKR-5	This comment identifies a different approach to Alternative 4. Refer to AG-3 and AG-4, which responds to comments related to the alternatives analysis.
BKR-6	This comment suggests that the off-site mitigation area is irrelevant and suggests creation of a mitigation bank. As identified in Section 4.4, *Biological Resources*, of the EIR, the off-site mitigation area would be used to mitigate impacts related to the loss of oak woodlands at the project site. This comment does not require any change to the environmental document.
BKR-7	This comment suggests quantifying impacts. Refer to GRe-7, which describes language used to classify impacts. The EIR uses both qualitative and quantitative analysis throughout the EIR; however, it is impossible to quantify all issue areas identified under CEQA Appendix G (e.g., Aesthetics). This comment does not require any change to the environmental document.
BKR-8	This comment suggests increasing the amount of affordable housing included in the project. Refer to KK-11, which addresses comments related to affordable housing.
BKR-9	This comment includes figures of this commenter's approach to Alternative 4. Refer to KK-21, which addresses this comment.

9.5.52 Carol Scalisi

Rcvd 8.1.22

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

* Water - lack of it? shortages

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 07/27/22 SIGNED: Carol Scalisi

email: scalisi.carol at gmail.com 1

CSc-1

9.5.52.1 Response to Letter from Carol Scalisi

Comment No.	Response
CSc-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, consistency with applicable planning documents, biological resources, water supply, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and CE-3, which addresses comments related to social and economic impacts.

9.5.53 Linda Shelby

Rcvd: 8/1/22

Linda Shelby 1782 Tricogy

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

WATER !

LSh-1

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7/27/22 SIGNED: Linda Shelby
email: lshelby805@gmail.com

*copy this letter into your word processing program.
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408 MUST BE RECEIVED BY AUGUST 1

9.5.53.1 Response to Letter from Linda Shelby

Comment No.	Response
LSh-1	This comment expresses concerns related to the density of proposed housing, air quality, biological resources, water supply, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth; GRo-3, which responds to comments related to air quality emissions; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and CE-3, which addresses comments related to social and economic impacts.

9.5.54 Flora Arguilla, MBA

Jennifer Guetschow

From: Flora Arguilla <abiarguilla@me.com>
Sent: Thursday, July 28, 2022 1:10 PM
To: Jennifer Guetschow
Subject: [EXT]STOP Nipomo development

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I honestly just want to know how people think this development will do anything other than lower the quality of the natural ecosystem in our rural Nipomo and also the quality of life of incumbent Nipomo residents. Myself and many of my Nipomo neighbors are very against this Dana Reserve development. Leave the oak trees alone! To quote a former natural resource manager for the city of SLO, "Replacing 4,000 200-year-old oaks with 4,000 tree saplings does not mitigate the loss of 2.25 million pounds of carbon dioxide sequestered by these trees every year." The Nipomo area is already experiencing a jobs/housing imbalance which will get **significantly** worse with the building of 1,441 new dwelling units. There is simply not enough infrastructure, roads, or jobs in this area for this. Please consider the detrimental ecological & social impacts that this project will have on our town. Do you really want a bunch of resentful agricultural residents at your doorstep? We take care of our own out here and will not hesitate to get in people's faces for unjust and explicitly greed-driven projects in our town. Think with morals, not wallets **for once**!

FA-1

FA-2

FA-3

Signed, a concerned and exasperated citizen of Nipomo,
Flora Arguilla, MBA

1

9.5.54.1 Response to Letter from Flora Arguilla, MBA

Comment No.	Response
FA-1	This comment expresses concerns related to the loss of oak trees at the project site, which also mitigates air emissions. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. Additionally, refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
FA-2	This comment raises concerns related to the job-to-housing balance within the community and impacts on local infrastructure as a result of population growth associated with the proposed project. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance and DR-3, which responds to comments related to utilities and public services.
FA-3	This project expresses this commenter's dedication to the existing community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.55 Sharon Ashworth

Jennifer Guetschow

From: SHARON L. ASHWORTH <leklein@aol.com>
Sent: Thursday, July 28, 2022 3:25 PM
To: Jennifer Guetschow
Subject: [EXT]Growth in Nipomo

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Please do not let the Dana Reserve Development get approved. Nipomo is very special because it is rural and allows for horse trails which are presently being taken over by construction and population growth. No longer can you walk or ride a horse on paths by trees or fields. Now one has to walk or ride a horse next to car traffic, houses and cross over streets. SA-1

The Dana Reserve Development will increase the population in Nipomo by 25% and ruin its rural flare. I moved here from and left a suburb area to find open spaces in Nipomo. Trilogy has already destroyed much of the uniqueness of Nipomo. What little open spaces we have left need to stay open for Nipomo to stay different and special. SA-2

Water is and continues to be an issue for our area. SA-3

SAVE NIPOMO STOP DANA RESERVE DEVLEOPMENT.

1

9.5.55.1 Response to Letter from Sharon Ashworth

Comment No.	Response
SA-1	This comment expresses concerns related to the density of proposed housing and associated population growth. Refer to BR-2, which addresses comments related to population growth associated with the proposed project.
SA-2	This comment expresses concerns related to the density of proposed housing and associated population growth. Refer to BR-2, which addresses comments related to population growth associated with the proposed project.
SA-3	This comment raises concern regarding the availability of water supply for the proposed project in addition to the existing service area. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.56 Wanda Cook

Jennifer Guetschow

From: Wanda Cook <wjcook12@hotmail.com>
Sent: Thursday, July 28, 2022 6:29 PM
To: Jennifer Guetschow
Subject: [EXT]Proposed Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I have some concerns/questions that pertain to the Proposed Dana Resrve Project. What concerns me most is the high concentration of housing (1200 units) on 288 acres. Trilogy, which is just a few miles away, is on 950 acres for the same number of 1200 houses. Black Lake in Nipomo is 554 homes on 421 acres. Yes, they have golf courses or grape vineyards, but these make the communities less crowded. Also, Nipomo is a mixture of suburban and rural neighborhoods, and the increased density and traffic will really impact the rural areas, which are adjacent to this new proposed housing project. Was this how the land was intended to be developed? I realize we need more housing, especially affordable housing, and that builders need to make money, but I believe that 1200 homes are too many for this area. The project needs to be downsized! WC-1 WC-2

The 3,948 oak trees to be removed is also a concern. When the Willow onramp was built and oak trees removed, to mitigate the loss of oak woodlands, oak trees were planted on property at the Dana Adobe to be used in their trails and nature walking areas, to be enjoyed by all. This site chosen to mitigate the loss of oak woodlands is "in the middle of nowhere". These old oak trees on the Proposed Dana Reserve Project provide habitats and nourishment to wildlife that took 100 years to develop and that now thrive. Oak trees eat up air pollutants, so our air quality will be negatively affected also. This is too many oak trees to be removed, and with less dense housing many more oaks could be saved/retained. Black Lake left many oak trees when they built their community, and these oaks are an amazing addition to the surrounding properties there, add much value. WC-3

Of course, I am concerned about the water issue, or lack of it in our area. Water is an unpredictable resource. Trilogy has their own water and sewage system that recycles water reusing treated urban wastewater on golf courses and common areas. It also recaptures storm water. Will this new development also include a water and sewer system that recycles and recaptures water? WC-4

Thank you for your concern.

Sincerely,

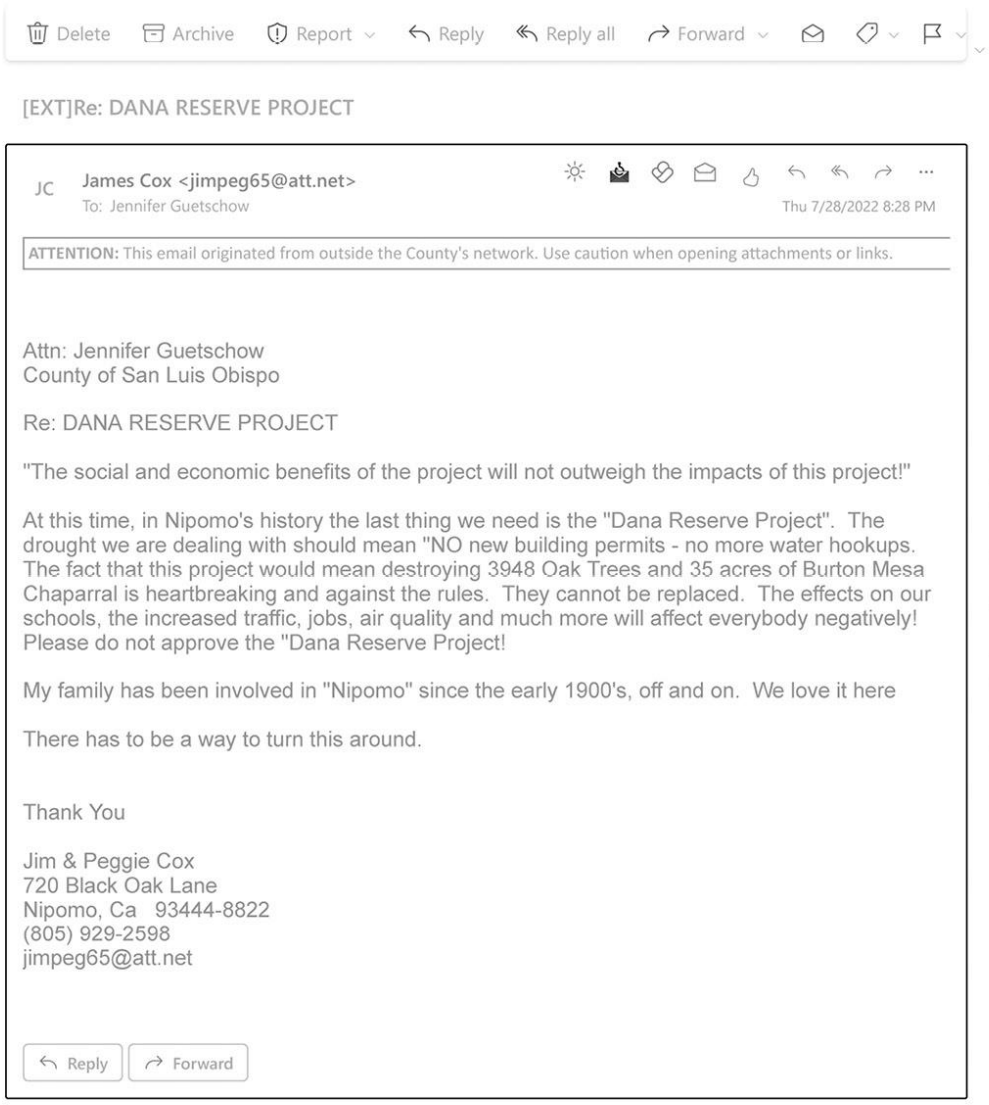
Wanda Cook
1994 Northwood Road
Nipomo, Ca 93444
wjcook12@hotmail.com

1

9.5.56.1 Response to Letter from Wanda Cook

Comment No.	Response
WC-1	This comment expresses concerns related to the density of proposed housing and associated population growth. Refer to BR-2, which addresses comments related to population growth associated with the proposed project.
WC-2	This comment suggests reducing the number of proposed residential dwellings. Refer to BR-3, which addresses comments related to a rural residential development project alternative.
WC-3	This comment raises concern over the loss of oak trees at the project site and associated habitat loss. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
WC-4	This comment raises concern regarding the increase in demand on NCSD water supply and wastewater infrastructure. Refer to MR-3 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions. In addition, refer to JK-2, JK-3, and PH-4 which responds to comments related to wastewater infrastructure.

9.5.57 Jim and Peggy Cox



Delete Archive Report Reply Reply all Forward

[EXT]Re: DANA RESERVE PROJECT

JC James Cox <jimpeg65@att.net>
To: Jennifer Guetschow
Thu 7/28/2022 8:28 PM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Attn: Jennifer Guetschow
County of San Luis Obispo

Re: DANA RESERVE PROJECT

"The social and economic benefits of the project will not outweigh the impacts of this project!" **JPC-1**

At this time, in Nipomo's history the last thing we need is the "Dana Reserve Project". The drought we are dealing with should mean "NO new building permits - no more water hookups. **JPC-2**
The fact that this project would mean destroying 3948 Oak Trees and 35 acres of Burton Mesa Chaparral is heartbreaking and against the rules. They cannot be replaced. The effects on our **JPC-3**
schools, the increased traffic, jobs, air quality and much more will affect everybody negatively! **JPC-4**
Please do not approve the "Dana Reserve Project!

My family has been involved in "Nipomo" since the early 1900's, off and on. We love it here **JPC-5**

There has to be a way to turn this around.

Thank You

Jim & Peggie Cox
720 Black Oak Lane
Nipomo, Ca 93444-8822
(805) 929-2598
jimpeg65@att.net

Reply Forward

Jim + Peggie Cox
720 Black Oak Ln.
Nipomo

mailed 7.28.22
rcvd 8.2.2022

July 28, 2022

ATTN: Jennifer Guetschow
County of San Luis Obispo

RE: Dana Reserve Project!!

"The social and economic benefits of the project will not outweigh the impacts of this project!"

At this time in Nipomo's history the last thing we need is the "Dana Reserve Project. The drought we are dealing with should mean no new building permits – no more water hookups. The fact that this project would mean destroying 3948 Oak Trees and chaparral is heart-breaking and against the rules. They cannot be replaced. JPC-6

The effect on our schools and the increased traffic, jobs, air quality and much more will affect everybody negatively! Please do not approve the

-2-

Dana Reserve Project.

My family has been involved in "Nipomo" since the early 1900's, off and on. We love it here.

There has to be a way to turn this around.

Thank you—

Jim & Peggie Coy
720 Black Oak Lane
Nipomo, CA 93444-8822
805-929-2598
jimpeg65@att.net

JPC-6 (cont'd)

9.5.57.1 Response to Letter from Jim and Peggy Cox

Comment No.	Response
JPC-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
JPC-2	This comment raises concern regarding the availability of water supply for the proposed project in addition to the existing service area. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
JPC-3	This comment raises concern over the loss of oak trees at the project site and associated habitat loss. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
JPC-4	This comment raises concerns related to public schools, an increase in traffic congestion, and air quality. Refer to BR-6, which responds to comments regarding public schools; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of transportation improvements; and GRo-3, which responds to comments related to air quality.
JPC-5	This comment expresses dedication to the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
JPC-6	The commenter also submitted a handwritten version of the comment letter; see the responses to comments above.

9.5.58 Nancy Ellison

Jennifer Guetschow

From: gardenrose@nwlink.com
Sent: Thursday, July 28, 2022 9:46 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Development - RESIDENT STRONGLY OPPOSED

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Letter/email to SLO Planning Commission re Dana Reserve Project:
SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

ATTENTION: SLO PLANNING COMMISSION
c/o JENNIFER GUETSCHOW
jguetschow@co.slo.ca.us

I am a Nipomo resident writing to express strong concerns about the Dana Reserve Project which is being planned for 288 acres of the unincorporated county community of Nipomo. I believe this project is being expedited by the County without due consideration or concern for the many problems it will bring for the semi-rural community of Nipomo, and the county as a whole.

The Draft Environmental Impact Report lists several Unmitigatable Significant Class 1 issues, all of which concern me as a resident who will be directly impacted. The following are some of my greatest concerns:

NE-1

1) DEIR Unmitigatable Significant Class 1 issue: BIOLOGICAL IMPACTS/UNIQUE ECOSYSTEM/FEDERALLY ENDANGERED SPECIES TO BE REMOVED.

Millions are spent each year trying to save California forests from wildfire, but SLO County plans to virtually set fire to 4,000 OLD GROWTH OAKS in an environmentally sensitive, unique area of the county - my home on the Nipomo Mesa. Each tree is a living work of art, having survived for hundreds of years, providing habitat for protected plants, animals, and birds that is irreplaceable. As a long time resident, I am in shock at the thought of such a wantonly irresponsible act. The destruction of this unique woodland will change the character of the Mesa and wipe out abundant wildlife that make living here so wonderful. This habitat should be placed off limits to development and protected, not replaced with a sprawling, artificial urban complex that will benefit no one but developers and others looking to profit from it. This project could be built anywhere. But **these trees can never be replaced**, and the wildlife that depend on this pristine woodland will not survive its loss. The project must not proceed.

NE-2

2) DEIR Unmitigatable Significant Class 1 issue: LAND PLANNING, TRANSPORTATION.

The proposed development is not in alignment with the South County Area Plan, including how this land was intended to be developed. The size and scope is totally out of character with the rural nature of the Nipomo Mesa and will adversely impact this area. **Nipomo does not have a local police force**. Thousands of additional residents with thousands more vehicles on rural roads never designed for heavy traffic will have a devastating effect on this community. Inflating population density far beyond what this area can handle will create unmanageable crime and traffic problems, turning our quiet, safe neighborhoods into dangerous, unpatrolled havens for criminal activity.

NE-3

3) WATER. NOT A CONSIDERATION DESPITE HISTORIC MEGADROUGHT?

Water sources throughout the County and State are evaporating, water tables are plummeting, but NCSD and other

NE-4

1

agencies declare that water is not an issue in proceeding with this enormous development. For years, NCSD has advised us in the strongest terms to conserve, emphasizing that supply is inadequate even for existing residents. The NCSD website says:

"The District remains in a Stage IV water shortage. No new actions will be enforced. The District is still not accepting new applications for service.
It is important that water suppliers recognize conservation fatigue as a real threat to gaining customer support in times when communities need to come together. On the Nipomo Mesa, many District customers have been practicing water conservation and, through their efforts, have successfully reduced water consumption over the past 18 years by 40%. When you factor in the pressures a growing community puts on water supplies, the amount of water saved is significant."

Why should Nipomo residents continue to heroically conserve water when NCSD has abruptly changed its priorities? Conservation is apparently no longer needed, as evidenced by its acquiescence to adding thousands of new customers with their attendant landscaping and other intensive water needs. Our water comes from outside SLO County and is dependent on Santa Barbara County/Santa Maria supply. In a few years when this historic megadrought has further depleted water tables, Santa Maria will have to reprioritize the needs of its own residents and Nipomo could be last in line at the pump. Instead of adding thousands of new users, we should be working to guarantee future water supplies for Nipomo's existing population.

NE-4 (cont'd)

The limited social and economic benefits of the Dana Reserve Project will not outweigh its many negative impacts. Existing residents will NOT BENEFIT from this poorly planned and conceived behemoth. As a citizen of Nipomo, I ask that this project be **denied** unless revised to such an extent that the development is greatly decreased.

NE-5

DATE: _____7/28/2022_____ SIGNED:__Nancy Ellison_____
email: ____gardenrose@nwlink.com_____

2

9.5.58.1 Response to Letter from Nancy Ellison

Comment No.	Response
NE-1	This comment asserts this project is incompatible with the existing community and contains Class I significant impacts. Refer to DT-2, which addresses this comment.
NE-2	This comment restates that the project would result in a Class I impact related to biological resources, including the loss of oak woodland habitat. Refer to MR-3, JK-4, and BR-1, which ~~addresses~~address comments related to biological resources.
NE-3	This comment raises concern regarding the project's inconsistency with applicable planning documents and the effects of proposed population growth on the community. Refer to ES-3, which addresses comments related to applicable planning policies; BR-2, which addresses comments related to population growth and the community's jobs-housing balance; and MR-2 and KE-3, which responds to comments related to public services.
NE-4	This comment raises concern regarding the adequacy of water supply during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
NE-5	This comment expresses concerns related to the project's impacts related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.59 Lori Manosar

Rcvd: 7.28.22

Mr. Greg Manosar
828 Inga Rd.
Nipomo, CA. 93444

Dear Jennifer Guetschow,

I am a resident of Nipomo, and will be living 2 blocks away from the proposed project "Dana Reserve."

Here are my concerns:

1. Housing density- changing land zoning from rural residential to single family or multi-family residential. There are concerns from myself and neighbors adjacent to this project that have livestock and roosters, chickens, etc. so close to this development. LM-1
2. Land planning- Many of the project plans are out of alignment with the south county area plan. The preservation of oak trees and open space uses was to be the first priority. If we consider alternatives, Alternative 3 is the most beneficial, and reduces the overall impact for the oak woodlands. LM-2
3. Biological impacts-Over 3,900 oak trees would be removed, federally endangered species, and special habitats removed, as indicated in the draft EIR. This will undermine the existing Oak Tree Ordinance for all future developments to come. LM-3
4. Water- Although NCSD has assured water should be adequate for this project, the current drought situation for California makes water reliability for the future supply a concern. LM-4
5. Transportation- All amenities for Nipomo are accessed by way of Teft Street. The Nipomo Swapmeet on North Frontage causes huge backups on Sundays. There are no additional improvements planned for this area and the additional 4,000 plus people travelling to businesses or the freeway which will just add to the congestion already evident. The Highway 101 will be impacted as well, with people commuting north or south for jobs or services. LM-5
6. Schools- The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further impact this community. D. Lange Elementary doesn't have the capacity to accommodate the student increase expected if the Dana Reserve Project goes through, and most likely students would be shifted to Nipomo Elementary which would contribute to more traffic and congestion of Teft Street. LM-6

Jennifer, the benefits of this project do not really benefit Nipomo as proposed. Many of these project concerns are voiced by the residents of the majority of Nipomo. Just consider postponing any decisions until the concerns are fully addressed. LM-7

Sincerely,

Lory Manosar

Lory Manosar
lmanosar@yahoo.com
Cell 805-878-3514

9.5.59.1 Response to Letter from Lori Manosar

Comment No.	Response
LM-1	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and AG-4, which addresses comments related to project alternatives and JEI-6, which addresses this comment.
LM-2	This comment expresses concern related to consistency with applicable planning documents and asserts that Alternative 3 would reduce impacts related to oak woodlands. Refer to ES-3, which addresses comments related to applicable planning policies and AG-3 and BR-3, which addresses comments related to project alternatives, including Alternative 3.
LM-3	This comment raises concern over the loss of oak trees at the project site and associated habitat loss, which is inconsistent with the County's Oak Woodland Ordinance. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. In addition, refer to ES-3, which addresses comments related to applicable planning policies.
LM-4	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
LM-5	This comment expresses concerns related to traffic congestion. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
LM-6	This comment raises concerns related to an increase in demand on public schools. Refer to BR-6, which responds to comments regarding to an increase in demand on public schools.
LM-7	This comment asserts that the benefits of the project do not benefit the community and asserts that the project should be postponed. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.60 George and Lori Mendez

Jennifer Guetschow

From: Lori <mendezlv@aol.com>
Sent: Thursday, July 28, 2022 2:03 PM
To: Jennifer Guetschow
Cc: District 4
Subject: [EXT]Concerns & Opposition to the Dana Reserve Project as Currently Proposed

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

ATTENTION: SLO Planning Commission
Dana Reserve/Jennifer Guetschow

As residents of Nipomo, we are writing this letter to voice our concerns with regard to what we consider adverse impacts to the community that will be created by this development as currently proposed.

First and foremost, the size of this project is of major concern with the drought/water issues in Nipomo. Considering the severe drought which has been ongoing for many years, with no end in sight it's irresponsible to add a development of this magnitude. We are currently struggling with water issues for existing residents so it is illogical to think this problem will not be greatly exacerbated by the addition of several thousand more residents. GLM-1

Another major concern is the infrastructure to support a project of this size. Traffic is already a problem and does not appear to be mitigated in any way by the current design and density of this project. Public services are very limited and will not be adequate for a population increase of this size. One can only guess that additional parcel taxes (Mello-Roos) will be added to already high property taxes to cover these expenses. These costs will of necessity be passed on to individuals who rent their homes rather than own them. In many cases this will make living in this area even more difficult for both owners and renters. GLM-2

Should this project be approved, there will undoubtedly be complaints about the nearby properties which are currently zoned for a limited number of livestock, which most likely will not be well received by the incoming residents. GLM-3

Also removing such a large number of mature trees and replacing them with small trees certainly does not mitigate the adverse impact on the environment and should be a serious consideration of whether this project is allowed to go forward. GLM-4

While additional housing is a major concern, there is no logical reason for a project of this magnitude and density at this particular site other than profit for the developer. Considering the size of San Luis County, there could certainly be considerably smaller developments spread throughout the county and better serve those in need of housing. Greatly reducing the density of this project would certainly mitigate some of the adverse affects to the community of Nipomo and existing residents. GLM-5

In view of the foregoing concerns it is requested that approval of this project be denied. GLM-6

Thank you in advance for considering our concerns.

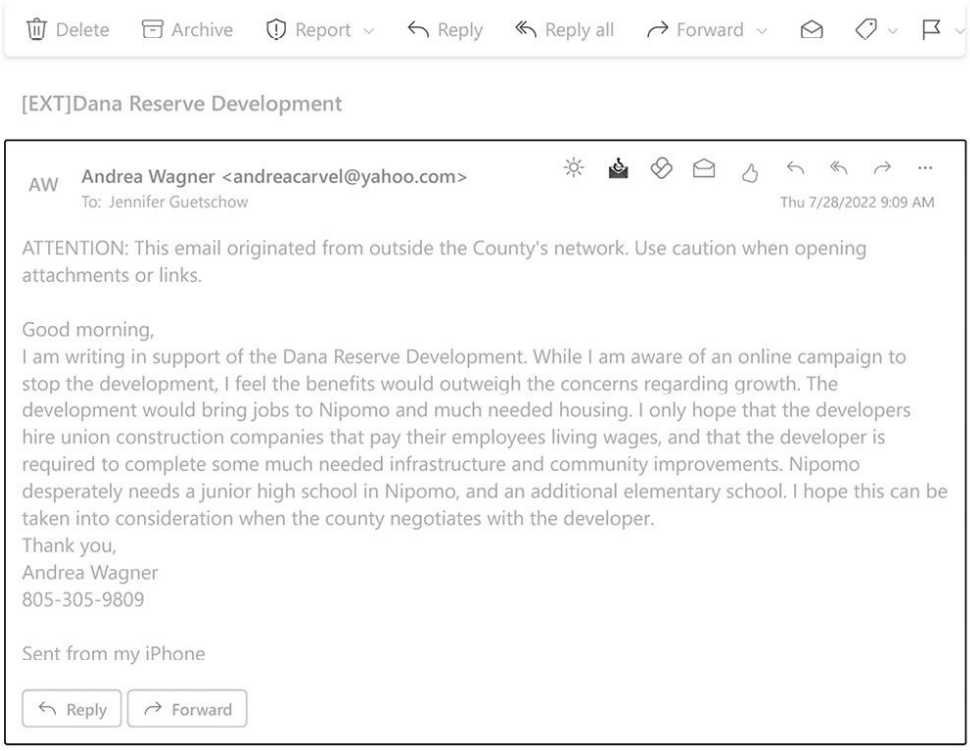
Concerned Residents,
George & Lori Mendez
515 Tejas Place
Nipomo, CA 93444

1

9.5.60.1 Response to Letter from George and Lori Mendez

Comment No.	Response
GLM-1	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
GLM-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
GLM-3	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and AG-4, which addresses comments related to project alternatives and JEl-6, which addresses this comment.
GLM-4	This comment raises concern over the loss of oak trees and replanting with young saplings. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
GLM-5	This comment suggests reducing the number of proposed residential dwellings. Refer to AG-3, which addresses comments related to a rural residential development project alternative.
GLM-6	This comment suggests denial of this project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.61 Andrea Wagner



9.5.61.1 Response to Letter from Andrea Wagner

Comment No.	Response
AW-1	This comment expresses support for the project and states that the benefits of the project would outweigh the concerns regarding growth. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.62 Steve Yamaichi

Jennifer Guetschow

From: Steve Yamaichi <yamafam@att.net>
Sent: Thursday, July 28, 2022 8:24 PM
To: Jennifer Guetschow
Cc: District 4
Subject: [EXT]Public Comment to the Dana Reserve Specific Plan Draft EIR

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer Guetschow,

My name is Steve Yamaichi and I am a 20-year resident of Nipomo. I am writing to you regarding the Dana Reserve Specific Plan Draft Environmental Impact Report (DEIR). I am in strong support of the County of San Luis Obispo to require a **full** Environmental Impact Report for the Dana Reserve residential project.

As a 30-year California State Park Ranger/Park Superintendent (retired), I have prior work experience, knowledge and understanding of the DEIR process.

After reading the submitted DEIR, in my opinion, the County must require a **full** EIR for the Dana Reserve residential project. I have listed all of the project DEIR categories that are identified as having Potentially Significant Impact to the environment.

DEIR Environmental Checklist	"Potentially Significant Impact"
Aesthetics	4 of 4 boxes checked
Air Quality	4 of 4 boxes checked
Cultural	2 of 3 boxes checked
Energy	2 of 2 boxes checked
Geology and Soils	8 of 10 boxes checked
Greenhouse Gas Emissions	2 of 2 boxes checked
Hazard and Hazardous Waste	5 of 7 boxes checked
Hydrology and Water Quality	7 of 9 boxes checked
Land Use and Planning	2 of 2 boxes checked
Public Services	6 of 6 boxes checked
Recreation	2 of 2 boxes checked
Transportation	4 of 4 boxes checked
Tribal Cultural Resources	2 of 2 boxes checked
Utilities and Service Systems	5 of 5 boxes checked
Wildfire	4 of 4 boxes checked

SY-1

I have specific concerns regarding the Nipomo Community Service District to provide sufficient water and current CalFire staffing to be able to provide fire protection for 1291 additional residences. The DIRE also states the County is to build and maintain the Collector A, B and C roadways.

SY-2
SY-3
SY-4

The project identifies the removal of 99 acres of oak woodland and approximately 2.5 acres of scattered oak canopy in chaparral. As part of their mitigation measures the project includes an "offsite 388-acre parcel known as Dana Ridge with approximately 200 acres of oak woodland and 120 acres of chaparral containing scattered oaks. On-site mitigation will include planting up to 1,500 oak trees."

SY-5

1

All of which may sound good but the removal of 99 acres of old growth oak trees will have a significant environmental impact to native vegetation. The removal of 99 acres of old growth oak trees is to be mitigated by the planting of 1500 oak seedlings is a terrible trade off. It will take decades and decades to replace the existing oak trees. I recall the County has a moratorium on the removal of oak trees. The DEIR did not identify who and how the 1500 new oak seedlings are going to be watered. The seedlings must be watered in order for them to survive and theoretically replace the existing oak trees. SY-5 (cont'd)

I support the County in requiring a **full** Environmental Impact Report for the proposed Dana Reserve Specific Plan residential project. SY-6

Steve Yamaichi
California State Park Superintendent (Ret.)

2

9.5.62.1 Response to Letter from Steve Yamaichi

Comment No.	Response
SY-1	This comment states this commenter's background and experience as it relates to the environmental review process, raises support for the preparation of an EIR, and reiterates the projects potential impacts as listed in the EIR. This comment does not identify any deficiency with the EIR and does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
SY-2	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
SY-3	This comment raises concern regarding the ability of CAL FIRE to provide fire protection services to the community in addition to the proposed project. Refer to MR-2 and KE-3, which responds to comments related to public services.
SY-4	This comment reiterates that the County is responsible for the maintenance of proposed Collectors A, B, and C. This comment does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
SY-5	This comment raises concern regarding the loss of oak woodlands at the project site and the adequacy of mitigation. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak woodlands.
SY-6	This comment reiterates support for the preparation of an EIR. This comment does not identify any deficiency with the EIR and does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.63 Denver Foose

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) **DenvF-1**
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR Quality of life for existing residents **DenvF-2**

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. **DenvF-3**

DATE: 7/29/2022 SIGNED:
email: denverfoose@gmail.com

9.5.63.1 Response to Letter from Denver Foose

Comment No.	Response
DenvF-1	This comment raises concern regarding consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
DenvF-2	This comment raises concern regarding neighborhood compatibility. Refer to PH-1, which addresses comments related to neighborhood compatibility.
DenvF-3	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.64 Erica Foose

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- (Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project) **EF-1**
- (Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed) **EF-2**
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR **EF-3**

All of above!

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. **EF-4**

DATE: 7/29/22 SIGNED: Erica Foose
email: ericabdubois@yahoo.com

9.5.64.1 Response to Letter from Erica Foose

Comment No.	Response
EF-1	This comment raises concern regarding consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
EF-2	This comment raises concern regarding biological resources. Refer to MR-3, JK-4, and BR-1, which addresses comments related to biological resources.
EF-3	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.
EF-4	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.65 Jason Hart

Jennifer Guetschow

From: jason@hartcre.com
Sent: Friday, July 29, 2022 9:04 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Specific Plan

Importance: High

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Good morning Jennifer,

I have a question regarding the Dana Reserve Specific Plan. I live on Cory Way, a street that is designated as a fire emergency road for the project. I have not been able to find where in the documents it addresses what that means for this street. Is there the possibility of needing to widen this road? If so, has that been looked at? My house not only has a very small front yard, but also has a drainage basin that all of the street and much of Sandydale's run off captures. If widening is needed it could have a major impact not only on my property, but also drainage issues for the immediate area. **JaH-1**

Thank you,

Jason Hart
Broker/Owner
BRE #01334694

HART
COMMERCIAL REAL ESTATE

Hart Commercial Real Estate
170 West Grand Ave, Suite 203
Grover Beach, CA 93433

T. 805.481.9010
F. 805.880.8100
C. 805.709.6491
Jason@HartCRE.com
www.HartCRE.com

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9.5.65.1 Response to Letter from Jason Hart

Comment No.	Response
JaH-1	This comment requests clarity regarding the need to widen Cory Road as part of the proposed project. Refer to JK-7, which identifies all proposed off-site road improvements.

9.5.66 Brock Lyster

Brock Lyster

612 Sandydale Dr.

Nipomo, Ca 93444

949-874-1641

brocklyster@mac.com

7/29/22

County of San Luis Obispo

Attention Jennifer Guetschow

The Dana Reserve reserves nor preserves nothing. It is proposed on a very large parcel with an incredible stand of protected Oak trees. All of the items that are listed by the developer that he wants to add to Nipomo can be done by infill development within the existing footprint of Nipomo as it is built. BL-1

There is no need to expand the footprint of the town into this large parcel to the North of town that should not be divided up in small parcels for the high-density development proposed. BL-1

The county should adhere to their standards of not allowing large parcels to be divided into smaller ones for development. I have heard sometimes land gets split to one house per 20 acres or in some cases one house per 5 acres. BL-2

Nipomo does not need this project. The destruction of nature and the adverse affects on the city infrastructure far outweigh any social or economic benefit to the people in Nipomo. BL-3

Nipomo is the Last Best Place on The Central Coast; let's keep it that way. BL-4

Sincerely,

Brock Lyster

Brock Lyster

9.5.66.1 Response to Letter from Brock Lyster

Comment No.	Response
BL-1	This comment states opposition to the proposed project and suggests that there is no need to expand the footprint of the existing community. This comment does not identify any deficiency with the EIR and does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
BL-2	This comment asserts that the County should only allow large parcels (i.e., 5 to 20 acres) at the proposed project site. Refer to AG-3, which discusses project alternatives, including rural residential development.
BL-3	This comment raises concern regarding the loss of native habitat, which outweighs social and economic benefits. Refer to BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.
BL-4	This project expresses this commenter's dedication to the existing community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.67 Marci Lyster

Marci Lyster

612 Sandydale Dr.

Nipomo, Ca 93444

949-294-2651

marcilyster@mac.com

7/29/22

County of San Luis Obispo

Attention Jennifer Guetschow

The impact of the Dana Reserve Project will not overcome the social and economic benefits of the project. ML-1

Nipomo does not need housing. There is not a shortage of houses here.

Nipomo does not need anymore tract house developments. There are many tracts that have already been built here.

Nipomo and the South County do not need anymore affordable housing. The South County has the majority of affordable housing in all of San Luis Obispo County. ML-2

If large parcels are to be divided for development it should be per the standards in place in the county.

I have heard this to be one house per twenty acres, or in more rare cases one house per five acres if it is even allowable at all. ML-3

Most working people commute from the South County to San Luis Obispo for work on Highway 101.

If one wants to develop more tract houses for working people they should be placed nearer to San Luis Obispo to cut down on commuters and lessen traffic. ML-4

With the exception of infill development of lots and land that are not built on in Nipomo, this area is built out. We do not need to sprawl out further. There is no need for this Dana Reserve Project and the impacts to the community due to destruction of open space around the town, Oak Destruction, increased traffic on the roads, increased strain on infrastructure and water use, far outweigh the social and financial benefit of this project for the people living in Nipomo. ML-5

Sincerely,

Marci Lyster

9.5.67.1 Response to Letter from Marci Lyster

Comment No.	Response
ML-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
ML-2	This comment asserts that Nipomo does not need more affordable or other housing. As evaluated in Section 4.14, *Population and Housing*, of the EIR, San Luis Obispo County is one of the least affordable housing markets in the United States. In fall 2021, the County Board of Supervisors identified housing as one of its top priorities for the fiscal year 2021 to 2023 budget and County policies and programs continue to focus on creating more housing availability and improving affordability. This comment does not identify any deficiency in the EIR; therefore, no changes to the environmental document are necessary. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
ML-3	This comment asserts that the County should only allow large parcels (i.e., 5 to 20 acres) at the proposed project site, as intended by applicable planning documents. Refer to BL-2, which addresses this comment.
ML-4	This comment suggests building homes closer to the city of San Luis Obispo to reduce commuter trips. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance and SSh(1)-5, which discusses the alternative location alternative.
ML-5	This comment states opposition to the proposed project and suggests that there is no need to expand the footprint of the existing community, refer to BL-1, which addresses this comment.

9.5.68 Sylvi Lyster

Sylvi Lyster

612 Sandydale Dr.

Nipomo, Ca 93444

949-500-0146

sylvilyster@mac.com

7/29/22

County of San Luis Obispo

Attention Jennifer Guetschow

The impact of the Dana Reserve Project will not overcome the social and economic benefits of the project. **SL-1**

Nipomo does not need housing. There is not a shortage of houses here.

Nipomo does not need anymore tract house developments. There are many tracts that have already been built here. **SL-2**

Nipomo and the South County do not need anymore affordable housing. The South County has the majority of affordable housing in all of San Luis Obispo County.

If large parcels are to be divided for development it should be per the standards in place in the county.

I have heard this to be one house per twenty acres, or in more rare cases one house per five acres if it is even allowable at all. **SL-3**

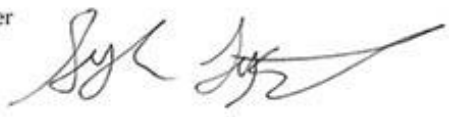
Most working people commute from the South County to San Luis Obispo for work on Highway 101.

If one wants to develop more tract houses for working people they should be placed nearer to San Luis Obispo to cut down on commuters and lessen traffic. **SL-4**

With the exception of infill development of lots and land that are not built on in Nipomo, this area is built out. We do not need to sprawl out further. There is no need for this Dana Reserve Project and the impacts to the community due to destruction of open space around the town, Oak Destruction, increased traffic on the roads, increased strain on infrastructure and water use, far outweigh the social and financial benefit of this project for the people living in Nipomo. **SL-5**

Sincerely,

Sylvi Lyster



9.5.68.1 Response to Letter from Sylvi Lyster

Comment No.	Response
SL-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
SL-2	This comment asserts that Nipomo does not need more affordable or other housing. Refer to ML-2, which responds to this comment.
SL-3	This comment asserts that the County should only allow large parcels (i.e., 5 to 20 acres) at the proposed project site, as intended by applicable planning documents. Refer to BL-2, which addresses this comment.
SL-4	This comment suggests building homes closer to the city of San Luis Obispo to reduce commuter trips. Refer to ML-4, which addresses this comment.
SL-5	This comment states opposition to the proposed project and suggests that there is no need to expand the footprint of the existing community, refer to BL-1, which addresses this comment.

9.5.69 Chris and Leslie Mehigan

Jennifer Guetschow

From: Leslie Mehigan <lesliehorton3@hotmail.com>
Sent: Friday, July 29, 2022 6:49 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission

c/o Jennifer Guetschow; jguetschow@co.slo.ca.us

Dear Jennifer,

We are writing to express concerns regarding the Proposed Dana Reserve Project, a project that will develop 288 acres in the Unincorporated Community of Nipomo. We have been residents of Nipomo for 15 years, raising our children here, and plan to stay for many years to come.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issues that concern us the most are increased traffic and the removal of almost 4,000 oak trees:

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality • Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)

Other areas of concern are future water availability and cost for Nipomo residents.

CLM-1

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of this project. As a longtime resident of Nipomo, we ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We are not opposed to new housing developments in Nipomo, we just fear this project is too large and destructive to our beautiful town.

CLM-2

Thank you for your time,

Chris and Leslie Mehigan
880 Chata St.,
Nipomo
lesliehorton3@hotmail.com

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9.5.69.1 Response to Letter from Chris and Leslie Mehigan

Comment No.	Response
CLM-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and water supply. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
CLM-2	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.70 Maureen Murphy

Jennifer Guetschow

From: Maureen Murphy <momurphy22@gmail.com>
Sent: Friday, July 29, 2022 5:26 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve _ comment from Nipomo resident

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hi Jennifer -

Nipomo is a quiet rural environment. This Dana Reserve Development proposal will absolutely negatively impact traffic on the already busy 101, suck up our water supply during a drought, and kill our rural environment. MMu-1

1. Traffic on the 101. At what point will the 101 freeway need to be expanded to accommodate the commuters from the 1290 units being built that will house multiple families who need to work? MMu-2

2. The proposal has the smaller units buttressed against our neighborhood! We will have NO BUFFER! Unacceptable. MMu-3

3. The rural environment of Nipomo is what makes Nipomo not Santa Maria! Someone saw some empty space and wanted to dump in a huge development - that can and will NEVER be turned back. MMu-4

4. We are in a drought! Water, water, water. MMu-5

5. Noise - how do they propose to mitigate the NOISE that Nipomo neighbors will be subjected to while building? MMu-6

6. What buffers will be provided for boundaries to immediate neighborhoods buttressed against this atrocity? MMu-7

7. Where will the be traffic routed to, during the building of project and afterwards? MMu-8

Best regards,
Maureen Murphy

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9.5.70.1 Response to Letter from Maureen Murphy

Comment No.	Response
MMu-1	This comment raises concerns related to traffic, water supply, and consistency with the rural community. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvement; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and PH-1, which addresses comments related to project consistency with the rural nature of the area.
MMu-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
MMu-3	This comment raises concern regarding the compatibility with surrounding parcels. Refer to AG-3, which addresses project alternatives and PH-1, which addresses comments related to project consistency with the rural nature of the area.
MMu-4	This comment expresses this commenter's dedication to the community. This comment does not identify any deficiency with the EIR and does not require any change to the environmental document. However, this comment will be made part of the administrative record and provided to local decision makers for their consideration.
MMu-5	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
MMu-6	This comment requests clarity regarding buffers. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. As evaluated in Section 4.1, *Aesthetics*, the project has the potential to alter the existing visual character of the project site through new development, grading, and loss of oak trees. Therefore, Mitigation Measures AES/mm-3.1 and AES/mm-3.2 were identified to require a visual screen comprised of planted oak trees along US 101. Therefore, no changes to the environmental document are needed.
MMu-7	This comment raises concern regarding the compatibility with surrounding parcels. Refer to AG-3, which addresses project alternatives and PH-1, which addresses comments related to project consistency with the rural nature of the area.
MMu-8	This comment raises concern over temporary traffic during project construction. As evaluated in Section 4.17, *Transportation* of the EIR, the project would not result in road closures during short-term construction activities or long-term operations. The project would not block or alter egress routes for surrounding residents. Individual access to adjacent properties would be maintained during construction activities and throughout the project area. As this issue was discussed in the EIR, no changes to the environmental document are necessary.

9.5.71 Short

Short
536 Chorro Way
Nipomo
mailed 7-29-22
rcvd 8-2-22

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

S(1)-1

Daily public service demands + traffic - Roads
public issue potential

S(1)-2

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

S(1)-3

DATE: 7/29/2022 SIGNED: [signature]
email:

- Water availability issues long & short term
- Law enforcement overreach: fast approaching with
  Cannabis Row - Mixed Integration Development
  projects has dramatically increased demands
  on public safety personnel & services.
  This is an ongoing & unresolved issue with
  these projects

S(1)-4

S(1)-5

9.5.71.1 Response to Letter from Short

Comment No.	Response
S(1)-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; DMW-1, JK-6, and JK-7, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.
S(1)-2	This comment raises concern regarding Mello-Roos and other issues, which are not evaluated under CEQA. Therefore, no changes to the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
S(1)-3	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
S(1)-4	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
S(1)-5	This comment raises concern regarding the project's increase in demand on police protection services. Refer to MR-2 and KE-3, which responds to comments related to public services.

9.5.72 Short

Short
586 Charro Way
Nipomo
mailed 7.29.22
rcvd 8.2.22

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

S(2)-1

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7.29.22 SIGNED:

email:

9.5.72.1 Response to Letter from Short

Comment No.	Response
S(2)-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; DMW-1, JK-6 and JK-7, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.73 Lisa Swiontek

Jennifer Guetschow

From: Team Mojoe Termite <team@mojoetermite.com>
Sent: Friday, July 29, 2022 1:59 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Adobe

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission
c/o Jennifer Guetschow;

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo. LSw-1
How can this not affect out air quality, water (I thought we were in a drought), not to mention the additional traffic! How many of these are going to be low income? LSw-2 My biggest concern is that you will be removing almost 4000 oak trees. This is unacceptable! LSw-3 We don't want this housing project!

Lisa Swiontek
Office Manager
1445 Grand Ave. Suite H
Grover Beach CA 93433
Phone : 805-548-8990
Fax: 805-574-1991
www.mojoetermite.com

1

Jennifer Guetschow

From: Team Mojoe Termite <team@mojoetermite.com>
Sent: Friday, July 29, 2022 2:01 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Adobe

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission
I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.
After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):
• Housing (imbalanced housing vs job creation, which also increases traffic)
• Transportation (increase traffic, impacts on many roads throughout Nipomo)
• Air Quality
• Greenhouse Gas Emission
• Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
• Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
• Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

LSw-4

Pay Now

Lisa Swiontek
Office Manager
1445 Grand Ave. Suite H
Grover Beach CA 93433
Phone : 805-548-8990
Fax: 805-574-1991
www.mojoetermite.com

1

9.5.73.1 Response to Letter from Lisa Swiontek

Comment No.	Response
LSw-1	This comment raises concerns related to air quality, water supply, and traffic. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
LSw-2	This comment requests clarity regarding the number of affordable homes. Chapter 2, *Project Description*, identifies that a minimum of 75 affordable homes would be included in the proposed project. In addition, refer to KK-11, which responds to comments regarding affordable homes. No changes to the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LSw-3	This comments states opposition for the proposed project and raises concern regarding the loss of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak woodlands.
LSw-4	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, biological resources, and social and economic impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.

9.5.74 Jim Taber

Jennifer Guetschow

From: Jim Taber <james.michael.taber@gmail.com>
Sent: Friday, July 29, 2022 2:47 PM
To: Jennifer Guetschow
Subject: [EXT]Dana reserve project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

C/O Planning Commission

The idea that buying land with trees is a solution to cutting down trees sounds really bizarre. You buy a piece of land that no one wants on the side of a mountain with trees and say it is preserving something is the kind of thinking some ass hat would have. I thought old growth trees were suppose to be preserved. I know your the ecologist here but in my business, most would laugh at me for such an idea. JiT-1

I'm not from California (Chicago)but i do like the quiet that rural locations provide. This is how we ended up buying a home here. JiT-2

My big concern now, as with the first meeting, traffic. If they start the project without opening the road to Willow, all the trucks will use Sandydale. The results will be our street will be beat into a gravel road. The the traffic pattern will be set and all future traffic will use this and frontage. Both streets (Sandydale and Frontage) are not made for this.

In addition, our streets are filled with pedestrians in the morning until evening. The commercial RV business and tree business seems to be the limit for Sandydale. JiT-3

I would like to see stop signs at the T intersections (Coryway and Briarwood Lane). On Sandydale and Frontage adding traffic bumps as another possible preventive measure, however, if Willow is opened first maybe this can be avoided. **I don't like the inconvenience of this idea but the alternatives would be worse.** JiT-4

I think all traffic from Dana to Frontage and Sandydale should be banned! JiT-5

The Swap-meet traffic on Sundays already make Frontage, Juniper and Mary useless and we all avoid these streets one day a week. Special events close the streets use on other occations. JiT-6

Best regards
Jim

Sent from my iPad

1

9.5.74.1 Response to Letter from Jim Taber

Comment No.	Response
JiT-1	This comment raises concern regarding the proposed off-site mitigation for oak trees. Refer to MR-3 and JK-4, which responds to this comment.
JiT-2	This comment expresses this commenter's background. This comment does not identify a deficiency in the EIR; therefore, no changes to the environmental document are needed.
JiT-3	This comment raises concern regarding traffic conditions along local roadways (Sandydale and Frontage). Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of transportation improvements.
JiT-4	This comment asserts that stop signs should be installed at Cory Way and Briarwood Lane. Refer to JK-7, which responds to comments related to implementation of transportation improvements.
Jit-5	This comment asserts that no traffic should occur along Sandydale and Frontage Roads. This comment does not identify a deficiency in the EIR; therefore, no changes to the environmental document are needed.
JiT-6	This comment identifies worsening traffic conditions due to existing special events. This comment does not identify a deficiency in the EIR; therefore, no changes to the environmental document are needed.

9.5.75 Rebecca Williams

Jennifer Guetschow

From: Becky Williams <dogslaw@gmail.com>
Sent: Friday, July 29, 2022 11:48 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

July 29, 2022

Department of Planning & Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos St Rm 300
San Luis Obispo CA 93401

Re: Proposed Dana Reserve Project

To All It May Concern:

THE IMPACTS FROM THE DANA RESERVE PROJECT WILL NOT OVERCOME THE SOCIAL AND ECONOMIC BENEFITS OF THE PROJECT. RW-1

Initially, I find it incomprehensible that a project of this magnitude would even be considered for the land area proposed. The biological impacts alone should have had Mr. Tompkins decline any further consideration. RW-2

This project does not follow the South County Area Plan (SCAP). For the types of uses for the SCAP, the preservation of oak trees and open space was to be the first priority. The Draft EIR results – detailing the severe and significant impacts to the property – is gut wrenching. Removal of almost 4,000 oak trees, federally endangered species and special habitats for the purpose of cramming another few thousand people into already over-crowded Nipomo should be criminal. Mr. Tompkins is delusional if he feels that he is mitigating the loss of 4,000 oaks by purchasing another (undevelopable) parcel of land outside the area he intends to destroy. RW-3 RW-4

My one-acre property backs up to the Dana Reserve property. The proposed plan would put high density multi-family residences a mere few feet from my back fence with views into my living room, bedroom, and kitchen. Mr. Campbell's remark about those of us concerned about this type of housing immediately adjacent to our property to "get over" it is flat out rude and ignorant. Get over yourself, Mr. Campbell. You will not, however, be able to get over the fact that you have a selfishly ill designed and overly ambitious project. RW-5 RW-6

WATER. How on earth could any reasonable person or entity even consider this type of project in Nipomo at all, much less with the lack of water in the area during an extreme drought? Isn't our water already precious enough? The EIR states that the DRSP is not known and the reliability of our future water supply is uncertain due to the potential for prolonged periods of drought and increasing water demands due to population growth. RW-7

As addressed in the EIR, the proposed project presents six significant and unavoidable immitigable issues, including population and housing, transportation, air quality, greenhouse gas emissions, land planning and biological impacts. RW-8

"The project would induce substantial unplanned population growth in the Nipomo area, resulting in a significant impact. Build-out of the DRSP would result in substantial population growth within the Inland RW-9

1

South County Planning Area that is not specifically projected or planned for in local or regional County planning documents and would result in excess of the projected population growth for the unincorporated community of Nipomo.

"The project would result in a cumulatively considerable impact related to substantial and unplanned population growth, resulting in a significant cumulative impact." RW-9 (cont'd)

Dressing up your model with attractive public facilities isn't a true rendering of what is going to result, especially putting supposedly "affordable housing" and small lots on the back steps of our larger properties. It's going to be a nightmare. RW-10

The homeless population in Nipomo is growing. While some choose to live on the street, the project's proposed "affordable housing" isn't going to offer any relief to those homeless individuals who do want a roof over their heads. RW-11

Traffic in and through Nipomo is already bad and accidents are common. Traffic laws and signs mean nothing in this area. There is little to no law enforcement in this regard. Highway 101 is regularly backed up through the area, even without an accident (or two) to make it worse. And you want to add another 4,500+ people to the Nipomo population? For what? As for Mr. Tompkins being a native of this area and the public being "advised" that he has the best interests of Nipomo at heart, I will never be convinced of that. Mr. Tompkins is interested only in deepening his own pockets. RW-12 RW-13

The homeless population in Nipomo is growing. While some choose to live on the street, the project's proposed "affordable housing" isn't going to offer any relief to those homeless individuals who do want a roof over their heads. RW-14

Traffic in and through Nipomo is already bad and accidents are common. Traffic laws and signs mean nothing in this area. There is little to no law enforcement in this regard. Highway 101 is regularly backed up through the area, even without an accident (or two) to make it worse. And you want to add another 4,500+ people to the Nipomo population? For what? As for Mr. Tompkins being a native of this area and the public being "advised" that he has the best interests of Nipomo at heart, I will never be convinced of that. Mr. Tompkins is interested only in deepening his own pockets. RW-15

Rebecca Williams
534 Briarwood Ln
Nipomo CA 93444
DogsLaw@gmail.com

PS: I see no reason to cc Lynn Compton with these comments. She has proved that she is in favor of this horrendous insult to Nipomo. RW-16

2

9.5.75.1 Response to Letter from Rebecca Williams

Comment No.	Response
RW-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
RW-2	This comment raises concern regarding the loss of oak trees at the project site. Refer to MR-3 and JK-4, which addresses this comment.
RW-3	This comment raises concern regarding the project's inconsistency with the South County Area Plan, including loss ok oak trees at the project site. Refer to ES-3, which addresses comments related to applicable planning policies and MR-3 and JK-4, which responds to comments related to the loss of oak trees.
RW-4	This comment raises concern over the population growth that would be facilitated by the proposed project. Refer to BR-2, which addresses comments related to population growth.
RW-5	This comment raises concern regarding the compatibility with surrounding parcels. Refer to AG-3, which addresses project alternatives and PH-1, which addresses comments related to project consistency with the rural nature of the area.
RW-6	This comment raises concern regarding a potential conflict of interest regarding the planning commission and the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
RW-7	This comment expresses concern related to water supply and drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
RW-8	This comment asserts this project is incompatible with the existing community and contains Class I significant impacts. Refer to DT-2, which addresses this comment.
RW-9	This comment expresses concern related to substantial population growth and inconsistency with the South County Area Plan. Refer to ES-3, which addresses comments related to applicable planning policies and BR-2, which addresses comments related to population growth.
RW-10	This comment expresses opposition to the proposed project and questions the ability to create affordable homes. Refer to KK-11, which responds to comments regarding affordable homes. This comment does not identify a deficiency in the EIR; therefore, no changes to the environmental document are needed.
RW-11	This comment raises concern over the proposed affordable homes. Refer to KK-11, which responds to comments regarding affordable homes.
RW-12	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
RW-13	This comment expresses opposition to the project due to the population growth that would be facilitated by the proposed project. Refer to BR-2, which addresses comments related to population growth.
RW-14	This comment raises concern over the proposed affordable homes. Refer to KK-11, which responds to comments regarding affordable homes.
RW-15	This comment expresses concerns related to an increase in traffic congestion and population growth that would be facilitated by the proposed project. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements and BR-2, which addresses comments related to population growth.
RW-16	This comment asserts the "Lynn Compton" should not be copied on emails. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.76 Linda Clarke

James Clarke
Linda Clarke
825 Inga Rd.
Nipomo

mailed 7.30.22
rcvd. 8.2.22

Dear Jennifer Guetschow,

I am a resident of Nipomo, and will be living 2 blocks away from the proposed project "Dana Reserve."

Here are my concerns:

1. Housing density- changing land zoning from rural residential to single family or multi-family residential. There are concerns from myself and neighbors adjacent to this project that have livestock and roosters, chickens, etc. so close to this development. LC-1
2. Land planning- Many of the project plans are out of alignment with the south county area plan. The preservation of oak trees and open space uses was to be the first priority. If we consider alternatives, Alternative 3 is the most beneficial, and reduces the overall impact for the oak woodlands. LC-2
3. Biological impacts-Over 3,900 oak trees would be removed, federally endangered species, and special habitats removed, as indicated in the draft EIR. This will undermine the existing Oak Tree Ordinance for all future developments to come. LC-3
4. Water- Although NCSD has assured water should be adequate for this project, the current drought situation for California makes water reliability for the future supply a concern. LC-4
5. Transportation- All amenities for Nipomo are accessed by way of Teft Street. The Nipomo Swapmeet on North Frontage causes huge backups on Sundays. There are no additional improvements planned for this area and the additional 4,000 plus people travelling to businesses or the freeway which will just add to the congestion already evident. The Highway 101 will be impacted as well, with people commuting north or south for jobs or services. LC-5
6. Schools- The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further impact this community. D. Lange Elementary doesn't have the capacity to accommodate the student increase expected if the Dana Reserve Project goes through, and most likely students would be shifted to Nipomo Elementary which would contribute to more traffic and congestion of Teft Street. LC-6

Jennifer, the benefits of this project do not really benefit Nipomo as proposed. Many of these project concerns are voiced by the residents of the majority of Nipomo. Just consider postponing any decisions until the concerns are fully addressed. LC-7

Sincerely,

Linda Clarke

9.5.76.1 Response to Letter from Linda Clarke

Comment No.	Response
LC-1	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and AG-4, which addresses comments related to project alternatives and JEI-6, which addresses this comment.
LC-2	This comment expresses concern related to consistency with applicable planning documents and asserts that Alternative 3 would reduce impacts related to oak woodlands. Refer to ES-3, which addresses comments related to applicable planning policies, and AG-3, which addresses comments related to Alternative 3.
LC-3	This comment asserts that the proposed project is inconsistent with the County's Oak Woodland Ordinance due to the removal of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site. In addition, refer to ES-3, which addresses comments related to applicable planning policies.
LC-4	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
LC-5	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
LC-6	This comment raises concern regarding the capacity of the Lucia Mar Unified School District (LMUSD) to serve the growth of school-aged children. Refer to BR-6, which addresses comments related to public schools.
LC-7	This comment asserts that the benefits of the project do not benefit the community and asserts that the project should be postponed. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.77 Dena Foose

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

Noise, increase Nipomo population by 25% with just this proposal!
Density = too many units, inconsistent with neighborhoods

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7/30/2022 SIGNED: Dena Foose
email: denafoose@yahoo.com

Dena Foose
Nipomo Resident

DenaF-1

DenaF-2

DenaF-3

9.5.77.1 Response to Letter from Dena Foose

Comment No.	Response
DenaF-1	This comment raises concern regarding consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
DenaF-2	This comment raises concern regarding an increase in noise and density. Refer to BR-2, which addresses comments related to population growth and PH-1, which responds to comments related to neighborhood compatibility. As evaluated in Section 4.13, *Noise*, A Noise Impact Study was prepared for the proposed project to determine impacts related to short- and long-term noise associated with the proposed project. Mitigation Measures N/mm-1.1 and N/mm-1.2 have been identified in the EIR to reduce short- and long-term increases in noise associated with the proposed project and ensure the project is consistent with the noise standards established in the County's Land Use Ordinance. Therefore, this issue is addressed in the EIR, and no changes to the environmental document are necessary.
DenaF-3	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.78 Heidi Ellis

Jennifer Guetschow

From: HEIDI ELLIS <team-e@pacbell.net>
Sent: Saturday, July 30, 2022 10:19 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I am writing to express my concern over the proposed Dana Reserve Project, a planned project developing 288 acres in the unincorporated county community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), I have substantial concerns. The non-mitigable issues that concern me most are:

• Catastrophic wildfire/Lack of Emergency Preparedness: while Section 2.2.1.2.1 of the DIER addresses offsite traffic improvements. However, there is nothing planned to mitigate the lack of safe and expedient egress for Nipomo community members in the event such as a catastrophic wildfire. An additional 1289+ vehicles in addition to vehicles of existing community members seeking hurried egress on poorly maintained single lane roads (and one double lane highway) in Nipomo will make it impossible to reach safety for those forced to evacuate due to fire and/or other disaster and result in the high probability of loss of life. HE-1

• Traffic: there is no infrastructure in place that will support or accommodate increased traffic as a result of this project. Traffic to and from Nipomo has increased significantly over the past 5 years, adding more strain to our already overstrained and poorly maintained transportation infrastructure in South County is not beneficial to the county as a whole. HE-2

• Water: Nipomo, as well as the entire state of California, has suffered drought conditions for nearly a decade. We are currently in severe drought status.
There is not water available for an additional 2500+ residents.
In addition, our existing water plan was established to disproportionately over charge and under serve residents of Nipomo who are already on the lower end of the median income scale for San Luis Obispo County residents. HE-3

•Land Planning: Multiple elements of this project are out of alignment with the South County area plan, including how this land was intended to be developed. HE-4

• Biological Impacts: There will be severe biological impacts should this project be green-lit, including the loss of 3,948 native California oak trees, irreparable loss of federally endangered species and native habitats. HE-5

After reading the Draft Environmental Impact Report (DEIR), I have substantial concerns. The non-mitigable issues that concern me most are:

• Catastrophic wildfire/Lack of Emergency Preparedness: while Section 2.2.1.2.1 of the DIER addresses offsite traffic improvements. However, there is nothing planned to mitigate the lack of safe and expedient egress for Nipomo community members in the event such as a catastrophic wildfire. An additional 1289+ vehicles in addition to vehicles of existing community members seeking hurried egress on poorly maintained single lane roads (and one double lane highway) in Nipomo will make it impossible to reach safety for those forced to evacuate due to fire and/or other disaster and result in the high probability of loss of life. HE-6

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• Traffic: there is no infrastructure in place that will support or accommodate increased traffic as a result of this project. Traffic to and from Nipomo has increased significantly over the past 5 years, adding more strain to our already overstrained and poorly maintained transportation infrastructure in South County is not beneficial to the county as a whole.

• Water: Nipomo, as well as the entire state of California, has suffered drought conditions for nearly a decade. We are currently in severe drought status.
There is not water available for an additional 2500+ residents.
In addition, our existing water plan was established to disproportionately over charge and under serve residents of Nipomo who are already on the lower end of the median income scale for San Luis Obispo County residents.

•Land Planning: Multiple elements of this project are out of alignment with the South County area plan, including how this land was intended to be developed.

• Biological Impacts: There will be severe biological impacts should this project be green-lit, including the loss of 3,948 native California oak trees, irreparable loss of federally endangered species and native habitats.

HE-6 (cont'd)

The very limited social and economic benefits of the Dana Reserve Project do not outweigh the significant, irreparable impacts to the community of Nipomo. As a resident of Nipomo, I ask that this project be denied until such time that the impacts to our community are able to be substantially mitigated. The residents of Nipomo deserve better.

HE-7

July 30, 2022
Heidi Ellis
Team-e@pacbell.net

Sent from my iPhone

9.5.78.1 Response to Letter from Heidi Ellis

Comment No.	Response
HE-1	This comment raises concern regarding wildfire and emergency preparedness/evacuation efforts. As evaluated in Section 4.20, *Wildfire*, the project would provide adequate emergency ingress and egress, emergency access, and accessibility to water for fire suppression, and would comply with all appropriate fire prevention methods. Implementation of Mitigation Measure WF/mm-1.1 would ensure consistency with applicable emergency plans. Additionally, Implementation of Mitigation Measure WF/mm-3.1 and compliance with PRC Section 4291 would reduce the potential for wildfire to occur within proposed open space areas that could exacerbate risk to proposed residential and commercial development. As this topic was evaluated in the EIR, no changes to the EIR are necessary.
HE-2	This comment expresses concern related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
HE-3	This comment expresses concern related to the availability of water for the existing service area in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
HE-4	This comment identifies the project's inconsistency with the South County Area Plan. Refer to ES-3, which addresses comments related to applicable planning policies.
HE-5	This project raises concern regarding biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-1 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
HE-6	This comment reiterates concerns related to wildfire and emergency preparedness/evacuation efforts, traffic congestion, water supply, consistency with applicable plans, and biological resources. Refer to HE-1 through HE-5, which addresses this comment.
HE-7	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.79 Eric Greening

Jennifer Guetschow

From: Eric Greening <dancingsilverowl@gmail.com>
Sent: Saturday, July 30, 2022 6:12 AM
To: Jennifer Guetschow
Subject: [EXT]Eric Greening comments on Dana Reserve DEIR

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello!

Thank you for the opportunity to review and comment on the Dana Reserve DEIR. Given the massive size of the document, and that I know that comprehensive comments are coming from others on some of my greatest areas of concern (California Native Plant Society on Biological Resources, for example), which include oak mitigation, water supply, and greenhouse gas emissions, I will focus here on impacts to our transportation system, and particularly to impacts on those who depend on public transit. EG-1

Before I get to this, however, in the process of recognizing that the most recent large project in the area with significant environmental impacts was the construction of the Willow Road Interchange and related circulation improvements, I feel moved to ask for an assessment of the cumulative impacts of the two projects not only on the transportation system but on oak woodlands and habitat fragmentation. On the latter issue, I would ask for an honest assessment of the success to date of the biological mitigation measures, particularly those relating to the replacement of the lost oak woodland. To what extent have the promised outcomes of these mitigation measures been achieved or not achieved, and what lessons does this information hold for our realistic expectations of those intended for the Dana Reserve Project, and for ways to possibly make them more effective and reliable. EG-2

To include a longer time frame in the evaluation of such mitigation measures, I would also ask for an honest assessment of the effectiveness or lack thereof of the mitigation measures for the replacement of the many trees taken for the Coastal Branch of the State Water Project. How many of the replacement trees are actually living today? What implications does this information hold for the effectiveness of measures intended to replace the losses? EG-3

Getting to issues of public transit, we are hampered by the nature of a one-time approval of a development project; it is hard to prescribe ongoing efforts through such a process, so it is typical, as here, that transit mitigations, as with this DEIR, take the form of one-off efforts such as creation of new transit stops and shaded parking spaces at Park and Ride lots. The problem with depending on such measures to provide for the incremental service needs such a project would create is that the greatest constraint to the needed service is the lack of OPERATING resources. Service levels on the Regional Transit Authority, including its Route 10 which passes through Nipomo in connecting Santa Maria, the Five Cities, and San Luis Obispo, have fallen in the wake of the pandemic, with no near-term prospect of their restoration. In fact, future service CUTS, rather than improvements, are most likely in the near term, due to a serious driver shortage and to a change in the definition of an "Urban Area" by the US Census which could cost the region millions of dollars in operational funding we now receive--see the staff report for Item F-1 on the agenda of the August 3rd meeting of the San Luis Obispo Council of Governments for details! It is unlikely that present or near-future financial resources, or the time in the schedules (adding travel time to a transit route adds labor expense as well as travel time for other passengers) could accommodate the new transit stops called for in this DEIR. EG-4

Nipomo has always been a difficult place for the meeting of the needs of the transit-dependent. A little over a decade ago, more than 500 requests for better fixed-route transit service in Nipomo were received through the Unmet Needs process, and were found "reasonable to meet," but no successful service resulted due to the attenuated form of the community. The Dana Reserve Project, being off-center from what passes for a nucleus of Nipomo, would not improve that situation; meanwhile, the developing economic recession, coupled with high fuel prices and massive spikes in the EG-5

1

price of used cars can be expected to significantly increase the number of people and households that would be transit dependent. EG-5 (cont'd)

I would urge the DEIR to go into greater depth on the REAL transit needs (which should include incorporating by reference the just-approved update of the Coordinated Social Services Public Transportation Plan for San Luis Obispo County) and to require mitigation measures that meet the real and growing needs, even if it means requiring that a substantial ENDOWMENT FUND be created to support ongoing operational needs. EG-6

Thank you for the opportunity to comment!

Eric Greening

2

9.5.79.1 Response to Letter from Eric Greening

Comment No.	Response
EG-1	This comment expresses concern related to oak mitigation, water supply, greenhouse gas emissions, transportation, and public transit. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. As discussed in Section 4.17, *Transportation*, of the EIR, the project includes the development of public transit facilities in addition to bicycle and pedestrian facilities that connect to existing facilities. As this discussion is included in the EIR, no changes in the environmental document are necessary.
EG-2	This comment raises concern regarding circulation improvements and biological mitigation measures. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
EG-3	This comment reiterates concern regarding the effectiveness of mitigation for biological resources and asserts additional assessment should be conducted. Refer to MR-3 and JK-4, which addresses this comment.
EG-4	This comment raises concern regarding public transit and capacity of facilities. As discusses in Section 4.17, *Transportation*, of the EIR, Buildout of the Specific Plan Area would include the development of an interconnected system of pedestrian and bicycle facilities, a Park and Ride transit center, and transit stops along Collector A. As this discussion is included in the EIR, no changes in the environmental document are necessary.
EG-5	This comment reiterates concern related to public transit and identifies economic impacts related to population growth on gas prices and used cars. Refer to EG-4, which addresses comments related to transit and BR-2, which addresses comments related to population growth. However, economic impacts related to are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Therefore, no changes in the environmental document are necessary.
EG-6	This comment reiterates concern related to public transit. Refer to EG-4, which addresses comments related to transit.

9.5.80 Kitt and Nora Jenae

Jennifer Guetschow

From: Kitt Jenae <hoofmessages@gmail.com>
Sent: Saturday, July 30, 2022 4:26 PM
To: Jennifer Guetschow
Subject: [EXT]RE: Dana Reserve development PLEASE RECONSIDER!!!!!!

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

With the Dana Reserve development increasing the population of Nipomo by 26% in an area of 1/2 a square mile HOW can this be considered?

Our local services and infrastructure cannot handle such a sudden increase, despite what politicians have promised!!!!! KNJ-1

Tefft is a mess now! HOW can Nipomo add 4800 more residents be even considered????? LUDICROUS!!!! KNJ-2

Add the the areas DROUGHT situation, Consider the FACTS AND RIPPLE EFFECTS! KNJ-3

I sure resonate LOUDLY with the July 7, 2022, article titled "Build or preserve?", an opinion piece just posted in the New Times San Luis Obispo.

WHAT are they in fact "reserving" or "preserving")?

PLEASE return to the prior top development priorities of "open space uses within the oak woodlands." KNJ-4

Replacing 4,000 200-year-old oaks with 4,000 tree saplings does NOT mitigate the loss of 2.25 million pounds of carbon dioxide sequestered by these trees every year. KNJ-5

Nipomo may need more affordable housing, but this project FAR EXCEEDS the number of housing units specifically projected or planned for in local and regional county planning documents.Nipomo's jobs/housing imbalance will get significantly worse with the creation of 1,441 new dwelling units! KNJ-6

And the environmental impact report (EIR) found that this project is potentially INCONSISTENT with more than 30 existing land use plans, policies, and regulations adopted for the purpose of avoiding environmental effects. KNJ-7

Sincerely,

Kitt and Nora Jenae

Nipomo, CA

805 931 0115

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9.5.80.1 Response to Letter from Kitt and Nora Jenae

Comment No.	Response
KNJ-1	This comment raises concern regarding population growth and associated impacts on public services and infrastructure. Refer to BR-2, which addresses comments related to population growth and MR-2 and DR-3, which addresses comments related to public services and community infrastructure.
KNJ-2	This comment raises concern regarding an increase in vehicle congestion along Tefft Street. Refer JK-6, which responds to comments related to traffic congestion along Tefft Street.
KNJ-3	This comment expresses concern related to water supply and drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
KNJ-4	This comment asserts that open space uses with the oak woodlands should be the top development priority. Refer to AG-3, which addresses project alternatives, including the La Cañada Ranch Alternative.
KNJ-5	This comment identifies project impacts related to the loss of oaks, which reduces air emissions. Refer to MR-3, JK-4, and FA-1, which addresses this comment.
KNJ-6	This comment expresses concern related to the density of housing and associated population growth from the proposed project. Refer to BR-2, which addresses this comment.
KNJ-7	This comment states the project's inconsistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.

9.5.81 Mark Mesesan

Jennifer Guetschow

From: Mark Mesesan <markmesesan@hotmail.com>
Sent: Saturday, July 30, 2022 8:10 AM
To: Jennifer Guetschow
Subject: [EXT]Opposition to Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Ms. Guetschow:

I am a Nipomo resident and am writing to express my opposition to the proposed Dana Reserve development project in Nipomo.

After considering the contents of the Draft Environmental Impact Report, I have significant concerns about the following impacts that will negatively affect our community:

1. Density of housing - it's just too great for the space and will negatively affect the attractive rural characteristics of our community — MMe-1
2. Transportation - increases in local traffic will negatively affect the attractive rural characteristics of our community — MMe-2
3. Air quality - it already is poor very often in this area due to blowing silica sand from the nearby Dunes; additional motor vehicles and traffic will compound the problem — MMe-3
4. Land planning - this development was ill-conceived and is out-of-step with the characteristics which make Nipomo an attractive place to live. It's more than Not In My Backyard. It's about change that will negatively change and impact Nipomo in perpetuity — MMe-4
5. Water - it just does not make sense to move forward with a development project like this at a time when water availability is such a significant concern, with no sign of improvement due to global warming — MMe-5

Community concerns like mine must outweigh the development objectives of the Dana Reserve Project. I respectfully request that you take action to prevent this project from moving forward. — MMe-6

Sincerely,

Mark Mesesan
873 Via Seco
Nipomo, CA 93444
435-830-7068

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9.5.81.1 Response to Letter from Mark Mesesan

Comment No.	Response
MMe-1	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to PH-1, which addresses this comment.
MMe-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
MMe-3	This comment raises concerns related to air quality. Refer to Gro-3, which addresses comments related to air quality and greenhouse gas emissions.
MMe-4	This comment expresses concerns related to consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
MMe-5	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
Mme-6	This comment suggests denial of this project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.82 David Paschke

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Un-mitigatable Significant Class 1 issue which concerns me most is (circle or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- (•) Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

Drain on resources. Police + Fire spread too thin, No plan to staff Stations.

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: 7-30-2022 SIGNED: [signature]
email: twinsfan528@gmail.com

David Paschke,
Nipomo Resident

DP-1

DP-2

DP-3

9.5.82.1 Response to Letter from David Paschke

Comment No.	Response
DP-1	This comment raises concern regarding biological resources. Refer to MR-3, JK-4, and BR-1, which addresses comments related to biological resources.
DP-2	This comment raises concern regarding an increase in demand on public services. Refer to KE-3, which responds to comments related to public services.
DP-3	This comment raises concern regarding consistency with an increase in noise. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.83 David Richards

Jennifer Guetschow

From: David Richards <drwa6aiw@gmail.com>
Sent: Saturday, July 30, 2022 6:56 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer Guetschow,

I wanted to provide to you my comments about the Dana Reserve Project plan. I am concerned about the size of the project, the number of people that it brings into our town, and the effect on traffic and the rural feel of our neighborhood. I live on Thompson near Nipomo High School and have seen the increase in traffic since Willow was extended to Thompson. I have a vision of what Nipomo and Thompson Avenue will be like after adding that many housing units, and it is not a happy one. I saw one estimate that the population of Nipomo would increase by 25%! And what a shame it would be to lose that many oak trees! I would rather have a smaller development that retains the rural, ranch feel of our town, perhaps larger lots that incorporate the oak trees, rather than cutting many of them down. The off-site area that would be used to mitigate the loss of plants and wildlife is not the same type of property and does not exactly make up for the loss. I know developers like to make the most on their investment, and that usually means the most housing units they can get the permits to build. However, they move on, and the neighbors who had their neighborhood developed have to live with the impact. I would like to limit the impact this development will have on our small town.

DRi-1
DRi-2
DRi-3
DRi-4

Thanks for listening.

David Richards
449 N Thompson Avenue
Nipomo, CA 93444

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9.5.83.1 Response to Letter from David Richards

Comment No.	Response
DRi-1	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to PH-1, which addresses this comment.
DRi-2	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to BR-2, which addresses comments related to housing and population growth.
DRi-3	This comment raises concerns over the removal of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site.
DRi-4	This comment suggests reducing the number of proposed residential dwellings. Refer to BR-3, which addresses comments related to a rural residential development project alternative.

9.5.84 Holly Sletteland

Holly Sletteland
4849 See Ranch Ln
Templeton, CA 93465

July 30, 2022

Jennifer Guetschow
Department of Planning & Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Subject: Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (PLN-1118, SUB2020-00047, LRP2020-00007, ED21-094)

Transmitted via email: jguetschow@co.slo.ca.us

Dear Ms. Geutschow,

Although I am not a resident of Nipomo, I am a long-time resident of San Luis Obispo County and was dismayed to learn about the proposed Dana Reserve development. I participated in the county effort to craft an ordinance to protect native trees over 20 years ago, advocating for mandatory rather than the voluntary restrictions on tree removals that were ultimately adopted. I was also active in the more recent undertaking to pass an ordinance to protect oak woodlands in 2017 in response to public outrage over thousands of oak trees being clear-cut by Justin Vineyards to make way for a vineyard. And yet here we are again, just 5 years later, with a proposal to cut thousands of oak trees over more than 100 acres to make room for new houses and businesses. **HS-1**

The DEIR correctly notes that the proposed project is inconsistent with many county goals and policies and will result in a large number of significant and unavoidable adverse impacts on the environment, including oak woodlands. Of key concern to me, is the fact that the project directly conflicts with several Biological Resource (BR) goals found in the Conservation and Open Space Element including: **HS-2**

- Goal BR 1 Native habitat and biodiversity will be protected, restored, and enhanced
- Goal BR 2 Threatened, rare, endangered, and sensitive species will be protected
- Goal BR 3 Maintain the acreage of native woodlands, forests, and trees at 2008 levels

The project is designed to destroy, rather than protect, native habitat and diversity. It calls for the removal of 1,073 oak trees from coast live oak forest, 2,676 from coast live oak woodland, and another 194 from Burton Mesa chaparral and grassland habitats for a staggering total of **HS-3**

3,943 trees. This is a significant loss in acreage of native oak woodland, forest and trees not only for Nipomo, but for the county as a whole. Moreover, an additional 750 trees are at risk of having their Critical Root Zone (CRZ) damaged by construction activity. The remaining trees left standing will be threatened by indirect impacts from the project as well, such as new insects and pathogens, urban runoff, and recreational activities.

HS-3 (cont'd)

There is no appropriate way to mitigate such a monumental loss of oak trees and their associated habitat in the near term. Although the EIR summary states that the no-net loss requirement for oak woodland and oak forest will be satisfied if the applicant permanently protects, enhances, restores, and/or recreates habitat at a 2:1 ratio, this really make no sense to me. Almost 4000 oaks and their associated ecological services will be obliterated at the site if the project is allowed to proceed. Conserving oaks on another property 2 miles away that doesn't support the same suite of sensitive species is not going to change that. If the trees at the mitigation site are not under imminent threat of destruction, it seems to me we end up with a net loss because the trees at the mitigation site would be there regardless of whether there is a conservation easement over them or not. Planting replacement trees doesn't adequately mitigate the loss either, because young saplings can't substitute for the habitat value or services provided by mature oaks for decades. This is especially true of trying to mitigate the loss by planting oaks as street trees. This sort of mitigation may have been reasonable when we weren't in the midst of a biodiversity crisis and a climate emergency, but it doesn't make sense anymore. We don't have centuries, or even decades, to wait for nature's resilience. If the county is serious about enforcing a policy of no net-loss of oak woodlands, it should require projects to avoid them and leave the trees standing.

HS-4

Beyond the threats to the oaks themselves, the forest and woodland provide irreplaceable habitat for a wide array of sensitive plants and animals. Although some of the impacts to sensitive plants may be able to be successfully mitigated, residual impacts to CRPR 4 and Watch List plants will be significant and unavoidable. The DEIR also suggests that many of the residual impacts to wildlife would be less than significant with mitigation, although I would beg to differ. Individual animals are bound to be missed during surveys to relocate them out of harm's way during construction, inevitably reducing the population and shrinking the gene pool of already sensitive species. And much of the habitat for both sensitive plants and animals at the site will be destroyed forever. The DEIR also neglected to mention that oaks are a keystone species, sustaining a much richer diversity of species than other trees. In addition to the vertebrate species mentioned in the DEIR, oaks host more insects than any other tree species, including a whopping 532 species of caterpillars, a critical source of food for birds and other wildlife.[i] Insects have declined by 40% across the globe, with a third of them ranked as endangered.[ii]

HS-5

The DEIR also noted that construction of the project, as well as subsequent vehicle miles travelled (VMT) and energy use by residents occupying the dwellings will create significant and unavoidable adverse impacts in Greenhouse Gas Emissions (GHG). However, there is no mention of the huge loss of carbon sequestration currently provided by the oak woodlands or the amount of carbon that will be released by cutting the trees. Like all plants, oaks fix atmospheric carbon dioxide (CO2) through photosynthesis and store its carbon in their tissues. Timothy J. Fahey, professor of ecology at Cornell University estimated "An approximate value for a 50-year-old oak forest would be 30,000 pounds of carbon dioxide sequestered per acre"[iii]. Beyond that, Douglas Tallamy notes in the Nature of Oaks "Oak contributions to below-ground carbon sequestration are also noteworthy. Like oak tissues above the ground, oak root systems are massive and built from carbon. But what makes oaks a particularly valuable tool in our fight against climate change is their relationship with mycorrhizal fungi: mycorrhizae make copious amounts of carbon-rich glomalin, a highly stable glycoprotein that gives soil much of its structure and dark color. Oak mycorrhizae deposit glomalin into the soil surrounding oak roots throughout the life of the tree. Every pound of glomalin produced by oak mycorrhizae is a pound of carbon no longer warming the atmosphere, and glomalin remains in soil for hundreds, if not thousands, of years. These factors rank oaks among our best options for scrubbing carbon from the atmosphere and storing it safely in soil throughout the world's temperate zones."[iv]

HS-6

Having identified numerous significant impacts, a range of alternatives aimed at avoiding or substantially reducing the impacts were considered in the DEIR. It was determined that a Residential Rural Cluster (Alternative 3) was the Environmentally Superior Alternative because it would best reduce the number and extent of significant environmental impacts and meet more of the project's primary objectives. The analysis of Alternative 3 states "the ability to cluster residential uses would allow the site to be developed in a way that would avoids and minimizes impacts to sensitive biological resources...Buildout of the site would be reduced due to the lower density of clustered residential development, which would ultimately reduce the amount of impacted oak woodland". While this reasoning *sounds* plausible enough and *may* be true, the lack of specificity concerning how many oaks would be spared makes it impossible to evaluate. How is the public to determine the veracity of this statement without knowing how many units would actually be built and where they would be clustered on the property? The original project proposes to remove almost 4,000 mature oak trees on the site, covering approximately 100 acres. How many trees over how many acres in what parts of the property will be removed for a clustered development?

HS-7

It seems to me we have to go back to the drawing board. The developer's preferred alternative should be rejected due to the overwhelming number of negative impacts. If

HS-8 (cont'd)

they still want to proceed, they should be required to bring forth a new proposal that is better suited for the site, preserves oak forest / woodlands and will greatly reduce the other adverse impacts identified in the DEIR for a future environmental review.

HS-8

Sincerely,



Works Cited

[i] Smithsonian Migratory Bird Center Lepidoptera Index dataset; *Smithsonian's National Zoo*, 19 Jan. 2017, nationalzoo.si.edu/migratory-birds/data-access. Accessed 29 July 2022.
[ii] Davies, Dave. "The World's Insect Population Is in Decline — and That's Bad News for Humans." NPR.org, www.npr.org/sections/goatsandsoda/2022/02/24/1082752634/the-insect-crisis-oliver-milman.
[iii] Fahey, Timothy J, et al. "Forest Carbon Storage: Ecology, Management, and Policy." Frontiers in Ecology and the Environment, vol. 8, no. 5, June 2010, pp. 245–252, 10.1890/080169.
[iv] Tallamy, Douglas W. NATURE of OAKS : The Rich Ecology of Our Most Essential Native Trees. S.L., Timber Press, 2021.

9.5.84.1 Response to Letter from Holly Sletteland

Comment No.	Response
HS-1	This comment asserts that the proposed project is inconsistent with the County's Oak Woodland Ordinance due to the removal of oak trees at the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site. In addition, refer to ES-3, which addresses comments related to applicable planning policies.
HS-2	This comment identifies that the EIR correctly states that the project is inconsistent with the goals identified in the County Conservation and Open Space Element (COSE). Refer to ES-3, which addresses comments related to applicable planning policies.
HS-3	This comment expresses concerns related to the loss of oak trees and associated habitat at the site. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
HS-4	This comment raises concern over the loss of oak trees at the project site and the adequacy of mitigation included in the EIR to address impacts to oak trees. Refer to MR-3 and JK-4, which addresses impacts related to the loss of oak trees at the project site.
HS-5	This comment expresses concerns related to the loss of oak trees. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
HS-6	This comment expresses concerns related to the loss of oak trees. Refer to JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
HS-7	This project raises concern regarding Alternative 3. Refer to AG-3 and AG-4, which addresses comments related to project alternatives.
HS-8	This comment asserts that the Developer's Preferred Alternative should be rejected. Refer to AG-4, which identifies a discussion of the alternatives analysis.

9.5.85 Stephanie Statom

Jennifer Guetschow

From: Stephanie Statom <stephaniestatom@yahoo.com>
Sent: Saturday, July 30, 2022 4:04 PM
To: Jennifer Guetschow
Subject: [EXT]"The social and economic benefits of the project will not outweigh the impacts of this project"

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer Guetschow (County of San Luis Obispo),

The impacts from the Dana Reserve Project will "not overcome the social and economic benefits of the project. SSt-1

I can't state enough how troubled I am by this proposal. What makes Nipomo beautiful are the open lands, oaks and wildlife. I can't see why the county would want the massive removal of oaks with tar and concrete poured over this picturesque pasture that faces the freeway. In doing so it removes the sight line of nature and swaps it for inappropriate concrete and buildings, squeezing Nipomo resources for a buck. SSt-2

This very piece of open space is the signature of Nipomo and has been one of my most favorite spots since I was a child. I grew up in Arroyo Grande and spent my childhood sleeping over with friends who lived under tall eucalyptus trees very close to this proposed development. I knew where I was when I saw the lot from the car window. I still use it as a landmark, still check for cattle. Maybe there will be cattle there again someday. Well sadly I guess that's out of the question now. I can't understand building ugly buildings right up the the freeway. I can't understand anyone thinking this is appropriate, pleasing, inviting . Enough of Nipomo is ruined in this way. SSt-3

I would hate to see this property looking like what happened to Arroyo Grande.
Concrete and buildings covering the hills and valley as far as you can see from AG to Shell Beach.
It's so ugly.
Please don't continue to make Nipomo Ugly as well. SSt-4

You are planning to massively populate Nipomo, change zoning that would cripple those living within the currant existing zoning. The families adjacent to the new proposed zoning I feel sorry for. This has happened to me in the town I live. I'm stuck living within a commercial Zone in a house from the 1930's. No one wants noise at night, people screaming, playing and talking, music and skateboards. Are you considering the impact this will have on individual families? SSt-5

Why does any kind of development have to be built all the way close to the freeway? For what purpose? To show off what? Please don't do that. It's pushy and falsely egotistical. SSt-6

NEXT: Where will all the wildlife go who live there? Have you made plans to relocate them? Of course this is illegal. It's illegal to relocate wildlife. So where do they go? SSt-7
A town is only as lovely as it's surrounding open space, proving humans and wildlife can exist together. Humans are drawn to nature and Nipomo residence are living here for this very reason. SSt-8

NEXT: ***Mature oaks take up to 40 years to provide shelter and food for certain wildlife. SSt-9
The habitat and micro climates these living giants created will be lost forever in that spot.

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Oak trees take 5 to 6 years to become completely self-sustainable. Even the fastest-growing oak trees will only grow about 3 feet per year. It takes decades before an oak tree is fully grown.

Mitigating Oak removal by planting new trees somewhere else will NOT mitigate the environmental impact their removal will create and it's a load of nonsense to offer to the public a young tree as an olive branch for the flattening of a mature grove of Oaks and other mature trees and it's surrounding habitat that uniquely provides for so much wildlife, legged or winged or other.

Once it's gone it's gone.

SSt-9

Many Nipomo folks are living with a well for water system. The drought and climate issues are making the situation of having enough water a real issue. Ground water will be minimized by covering this lot with concrete and tar.

SSt-10

Please see to it that this proposed development is stopped in its tracks and a REAL environmental Impact study is done. Please lets protect these open spaces with our lives. They give to us more than we understand.

SSt-11

Sincerely,

Stephanie Statom

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9.5.85.1 Response to Letter from Stephanie Statom

Comment No.	Response
SSt-1	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.
SSt-2	This comment expresses concerns related to oak trees and the associated alteration of the visual character of the project site. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
SSt-3	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to PH-1, which addresses this comment.
SSt-4	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to PH-1, which addresses this comment.
SSt-5	This comment raises concern regarding noise and population growth associated with the change in zoning. Refer to MMu-6, which addresses noise; BR-2, which addresses population growth; and PH-1, which addresses comment related to the rural character of the project area.
SSt-6	This comment expresses concerns related to the project's consistency with the existing rural character of the project area and visibility along the freeway. Refer to PH-1, which addresses comment related to the rural character of the project area.
SSt-7	This comment expresses concern related to common wildlife. Refer to BR-1, which addresses this comment.
SSt-8	This comment praises the community's open space which provides habitat for wildlife. Refer to MR-3 and BR-1, which addresses comment related to habitat loss and wildlife and PH-1, which addresses comments related to the rural character of the project area.
SSt-9	This comment raises concern over the loss of oak trees at the project site and the adequacy of mitigation included in the EIR to address impacts to oak trees. Refer to MR-3 and JK-4, which addresses impacts related to the loss of oak trees at the project site.
SSt-10	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions. In addition, refer to GRe-9, which addresses groundwater recharge.
SSt-11	This comment suggests denial of this project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.86 Jessica Wallace

Jennifer Guetschow

From: Sea Mystic <ladyseamyst@gmail.com>
Sent: Saturday, July 30, 2022 2:11 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Project Concerns

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

To whom it may concern, while I have used a template of someone much more succinct than I, it is by no means to be imparted as giving less weight to the itemized concerns regarding this project. I have been a long time resident of Nipomo beginning in 1994 as a high school student living on Kent Street to my current residence of over 8 years on Tefft St. JW-1

The recent Tefft fire could have been a catastrophic failure and many lives would have been lost had there been a large scale project like the Dana Reserve built there without abundant means of escape. JW-2

Thank you for your consideration of mine and many others desire to preserve the safety of our community.

Jessica Wallace

I'm writing to express my concern over the proposed Dana Reserve Project, a planned project developing 288 acres in the unincorporated county community of Nipomo. JW-3

After reading the Draft Environmental Impact Report (DEIR), I have substantial concerns. The non-mitigable issues that concern me most are:

• Catastrophic wildfire/Lack of Emergency Preparedness: while Section 2.2.1.2.1 of the DIER addresses offsite traffic improvements. However, there is nothing planned to mitigate the lack of safe and expedient egress for Nipomo community members in the event such as a catastrophic wildfire. An additional 1289+ vehicles in addition to vehicles of existing community members seeking hurried egress on poorly maintained single lane roads (and one double lane highway) in Nipomo will make it impossible to reach safety for those forced to evacuate due to fire and/or other disaster and result in the high probability of loss of life. JW-4

• Traffic: there is no infrastructure in place that will support or accommodate increased traffic as a result of this project. Traffic to and from Nipomo has increased significantly over the past 5 years, adding more strain to our already overstrained and poorly maintained transportation infrastructure in South County is not beneficial to the county as a whole. JW-5

• Water: Nipomo, as well as the entire state of California, has suffered drought conditions for nearly a decade. We are currently in severe drought status.
There is not water available for an additional 2500+ residents.
In addition, our existing water plan was established to disproportionately over charge and under serve residents of Nipomo who are already on the lower end of the median income scale for San Luis Obispo County residents. JW-6

•Land Planning: Multiple elements of this project are out of alignment with the South County area plan, including how this land was intended to be developed. JW-7

• Biological Impacts: There will be severe biological impacts should this project be green-lit, including the loss of 3,948 native California oak trees, irreparable loss of federally endangered species and native habitats. JW-8

The very limited social and economic benefits of the Dana Reserve Project do not outweigh the significant, irreparable impacts to the community of Nipomo. As a resident of Nipomo, I ask that this project be denied JW-9

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until such time that the impacts to our community are able to be substantially mitigated. The residents of Nipomo deserve better. JW-9 (cont'd)

9.5.86.1 Response to Letter from Jessica Wallace

Comment No.	Response
JW-1	This comment established this commenter's background as it relates to the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
JW-2	This comment expresses concern related to emergency evacuation. Refer to HE-1, which addresses comments related to wildfire.
JW-3	This comment expresses gratitude for the public comment period and identifies that the project consists of Class I impacts. Refer to DT-2, which addresses this comment.
JW-4	This comment expresses concern related to wildfire, emergency preparedness, and emergency evacuation. Refer to HE-1, which addresses comments related to wildfire.
JW-5	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JW-6	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
JW-7	This comment expresses concerns related to the project's consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
JW-8	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
JW-9	This comment expresses concerns related to the project's social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.87 Laura Ahler

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern):

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)
- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR Water & public services

LRA-1

LRA-2

* AGAIN, Nipomo is bringing $ to the county of SLO, but $ is not coming back to the Nipomo community.

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

LRA-3

DATE: 7-31-22 SIGNED: Laura R. Ahler
email: jlahler93@gmail.com

*copy this letter into your word processing program.
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408 MUST BE RECEIVED BY AUGUST 1

9.5.87.1 Response to Letter from Laura Ahler

Comment No.	Response
LRA-1	This comment expresses concerns related to the density of proposed housing, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, and biological resources. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
LRA-2	This comment expresses concerns related to water supply and public services. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions and KE-3, which responds to comments related to public services.
LRA-3	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.88 Dave and Sandy Christiansen

From: Sandy Christiansen <mrschristiansen2012@gmail.com>
Sent: Sunday, July 31, 2022 10:16 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve - We Oppose

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,

We oppose the Dana Reserve Development Plan and wish to have our concern and opposition recognized. Our basic concerns include the following:

Traffic - ~4800 new residents in such a small space is going to create havoc on local traffic, particularly during commute times and school start/stop times. Ten Oaks, despite what local politicians claim, already has an excessive amount of traffic during those times...please note the traffic survey the county conducted on Ten Oaks was during Covid in July of 2020 so it does not reflect our "normal" traffic load. Additionally, the corner of Glenhaven and Hetrick is a hairpin turn, and very dangerous. Additional traffic is only going to make that turn even more treacherous. Please consider closing Hetrick/Glenhaven at the hairpin turn and opening Hetrick all the way through to Pomeroy so that the Pomeroy to Willow shortcut via Ten Oaks is no longer necessary. Opening Hetrick and closing Glenhaven eliminates the need to come to Ten Oaks.

DSC-1

DSC-2

Additionally, these homes are being proposed/marketed as being beneficial to workers and that residents would not need to contribute to traffic…that they can guarantee they would reduce vehicular trips. This is preposterous. The ratio of jobs per capita in Nipomo is lower than any other town in the county, and we are on the border of Santa Barbara county. If you build homes for workers here, they will have to commute. And they will be closer to jobs in Santa Maria than in our own county. If these homes are truly for the "working class", then they should be built where the jobs are…further north, in the middle of the county! Otherwise, you're just housing Santa Maria's work force. It makes no sense, and it will definitely create

DSC-3

DSC-4

more traffic on both the city streets and the highway. DSC-4 (cont'd)

Light, Noise and Air Pollution - the development plan is too dense, and will illuminate our night sky, and bring added noise and air pollution. Please require a large setback and extra tall natural screen along the western boundary against Hetrick and reduce the number of homes. DSC-5

Devaluation of real estate in adjacent neighborhood - our homes on Ten Oaks are worth $1M+ and all sit on approximately one acre or more. The new residences are dense housing, even the "larger" homes, and are not of like kind to the adjacent neighborhood. This will devalue our homes. While I understand this is a "not in my backyard" argument, the devaluation of our neighborhood will impact Nipomo as a whole. Please significantly reduce the number of homes and require larger lots so that they are of like kind to the surrounding established neighborhoods. DSC-6

Water requirements in severe drought - given the current state of our State with regard to water use and mandates due to drought, we do not trust the agreement with Santa Maria to be enough of a guarantee that we will not be in a shortage when these new homes are added. Contracts are broken all the time and the water supply this project is relying upon does not even come from the same county. Santa Barbara county has no strong reason to support the water demands when severe shortages become an issue. They will break the contract and supply Santa Barbara county residents first. DSC-7

Electrical grid stress - the addition of 1,289 all electric homes will bring more brown outs to our area. We all know PG&E has severe issues already. Please reduce the amount of homes to reduce the strain on our electrical grid and keep us all powered up. DSC-8

Stress on emergency services and infrastructure - More people to service means we need more Sheriff, Fire, Paramedics, etc. They are already stretched very thin. Please reduce the number of new residences. With a 25% increase to our population with only one development, the town is not ready to support the residents. We currently only have one grocery store, and DSC-9 DSC-10

it is already overtaxed and understocked...try stopping by for milk on a Sunday afternoon. We
are already underserved, please don't make it worse! And PLEASE do not put a fire or police
station in the development!

DSC-10 (cont'd)

DSC-11

Devastation to Flora and Fauna - we are not botanists or arborists, but we do love our oaks
and native plant life. We believe the DEIR is filled with half truths and glossing over the real
devastation that will happen to the Dana Reserve and how it will impact our wildlife and Nipomo
as a whole. The plan, as it currently stands, will exterminate federally protected native plants
that cannot be replaced and KILL approximately 4,000 "protected" oaks without proper
mediation. The mediation plan bases the "preservation" off of 197 oaks, not 4,000, and it will
be in another location across the freeway...none of this makes sense. For those of us that also
own many of these large OLD oak trees (ours are estimated to be about 300 years old!) and do
everything in our power to make sure they continue to live long healthy lives, it makes no sense
that the developer is allowed to destroy SO many! We cannot even begin to fathom what level
of destruction of local wildlife habitat and the wildlife itself this will bring. It is heart
wrenching. Please do not devastate the landscape so drastically. Please reduce the
development.

DSC-12

It seems that this project is a pipe dream filled with all sorts of hollow promises and glosses
over the real damage that will be done. How does it make any sense at all to increase the
population of Nipomo by 25%in ONE project that is on only 288 acres. Who would ever think
that is a good idea? This project is much too large for the space, does not fit the community
character or needs, and brings multiple types of devastation to our community. We implore you
to please take these things into serious consideration and require the developer to make some
drastic changes to the existing plan.

DSC-13

DSC-14

Thank you for your consideration,

Dave and Sandy Christiansen
Members of the Nipomo Action Committee
Homeowners on Ten Oaks Way

9.5.88.1 Response to Letter from Dave and Sandy Christiansen

Comment No.	Response
DSC-1	This comment expresses concern over an increase in traffic. Refer to DMW-1, JK-6, and JK-7, which address comments related to an increase in traffic congestion and implementation of transportation system improvements.
DSC-2	This comment expresses concern over an increase in traffic and associated hazards along local roadways. Refer to DMW-1, JK-6, and JK-7, which addresses comments related to an increase in traffic congestion and implementation of transportation system improvements.
DSC-3	This comment raises concern regarding the jobs-to-housing balance in the community. Refer to BR-2, which addresses this comment.
DSC-4	This comment suggests that the project would not create affordable homes and asserts that development should be moved elsewhere in the county. Refer to ML-4, which addresses this comment.
DSC-5	This comment raises concern regarding light, noise, and air pollution. Refer to DT-1, which addresses this comment.
DSC-6	This comment raises concern regarding the compatibility with surrounding parcels and devaluation of surrounding properties. Refer to AG-3, which addresses project alternatives and PH-1, which addresses comments related to project consistency with the rural nature of the area. In addition, refer to CE-3, which addresses comments related to social and economic impacts.
DSC-7	This comment raises concern over the reliability of water supply. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DSC-8	This comment expresses concern related to the reliability of PG&E and asserts the number of homes should be reduced to avoid burn outs of the electrical grid. As discussed in Section 4.6, *Energy*, of the EIR, the project would be required to implement solar panels and other energy reduction measures, which would reduce impacts on existing electrical infrastructure. As this issue was discussed in the EIR, no changes to the environmental document are necessary.
DSC-9	This comment expresses concern related to an increase in demand on public services and commercial services. Refer to MR-2 and KE-3, which responds to comments related to public services.
DSC-10	This comment expresses concern related to an increase in demand on commercial services. Refer to SSh(1)-1, which responds to comments related to commercial services.
DSC-11	This comment expresses concern related to an increase in demand on public services, including police and fire protection services. Refer to KE-3, which responds to comments related to public services.
DSC-12	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
DSC-13	This comment raises concern over the density of proposed population growth. Refer to BR-2, which addresses comments related to population growth.
DSC-14	This comment expresses concern related to the project's inconsistency with the rural nature of the project area. Refer to PH-1, which addresses this comment.

9.5.89 Jamie Cortez

Jennifer Guetschow

From: Jamie Cortez <jc40p@yahoo.com>
Sent: Sunday, July 31, 2022 12:47 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Reject the Dana Reserve development based on the traffic impacts alone. The southbound traffic during the work week coming home is bad enough. Another thousand plus cars from these homes is not going to help us. Reject Dana Reserve please! JC-1

1

9.5.89.1 Response to Letter from Jamie Cortez

Comment No.	Response
JC-1	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.

9.5.90 Cherie Fitz-Gerald

Jennifer Guetschow

From: Cherie Fitz-Gerald <Cherfts@outlook.com>
Sent: Sunday, July 31, 2022 7:34 AM
To: Jennifer Guetschow
Subject: [EXT]The Dana Reserve Development

Importance: Low

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear County, s

Again, the residents of Nipomo, are having to address the County with a problem the Planning Board already knows exists. This project in no different than the Letitia Project in which the residents of Nipomo proved to the county that the water and road infrastructure are not adequate for this type of development. Nipomo does not enough water to sustain a project of this size nor does it have the resources to fight a fire if one should occur. CFG-1

As you well know, the problem for this project is the same as for all the other projects that have been before your board in the last 15 years. WATER, WATER, WATER. The county has put a hold on all water wells being drilled for Agricultural but this also affected Residential Water Wells. We were in the middle of having a well drilled when the SLO County put a hold on any wells being drilled which stopped our residential well from being drilled on the date it was scheduled. NIPOMO HAS A SERIOUS WATER SHORTAGE there are many areas of Nipomo that are dependent on rainfall as our water source. Much of Nipomo's property does not sit on an aquafer, we are in fractured shale. Therefore we do not have a pool of underground water to pull from. Many residential water wells have gone dry in the last 10 years and long time residents have had to re-drill very deep wells in order to have sufficient water for their residential needs. These long time residents are still conserving water even though they have new wells. CFG-2

Nipomo is also a bedroom community as it does not support head of household jobs which means all future residents will be driving to their jobs location. This creates a problem for the existing road system and there is not a future plan for mitigating traffic, which means it does not have a plan in place for EMERGENCY FIRE EXITING OF THE COMMUNITY. CFG-3

So let's address the main issues

1. WATER, WATER, WATER - NIPOMO is struggling with being able to supply the current residents with adequate water. Wells have gone dry and back up sources of water have had to be put in place just for normal daily use. CFG-4
2. ROADS, ROADS, ROADS - The roads in Nipomo are not adequate for an additional inflow of 1500-3000 residents. The county is big on promising permit project money for roads but in the end redirects that money to other less appropriate projects. I have watched this happen since 1984. Project money was dedicated to pave the Thompson Area downtown and it was redirected and never was completed. The permit money was used to support 13 other ridiculous projects that were also never completed. CFG-5
3. SCHOOL SAFETY-The existing community does not have adequate roads to evacuate the schools if there were a fire or other natural disaster or God forbid another school shooting. CFG-6
4. NIPOMO IS A BEDROOM COMMUNITY-People sleep here they do not work here. There are very few HEAD OF HOUSEHOLD JOBS in Nipomo. This forces residents to use natural resources already in short supply putting them in a commuting position just to get to work. CFG-7
5. SOUTH COUNTY AREA PLAN-this project is not in alignment with the plan on how this land was intended to be used. CFG-8
6. BIOLOGICAL IMPACTS-the loss of over 3000 native California oak trees (old growth) and the irreparable loss of federally endangered species and native habitats. CFG-9

1

As a long time Nipomo resident I have been involved in many of the county workshops and planning of developments. What was promised has usually never been brought to fruition.
It is time the county stops asking us to fight for what they know is not a good fit with the community. This is not why the residents of Nipomo have spent so many hours of our time meeting with County Officials, Boards, and Commissions. We have had workshops and have set up Advisory committees and still have to bring all these issues back to the County's attention with each newly elected board or commission. It is time for you to communicate amongst yourselves so that these projects do not even get to this stage. CFG-10

Please deny this project due to the shortage of WATER in our community, the inadequate ROAD infrastructure and the ENVIRONMENTAL IMPACT on natural and federal species including but not limited to Native California Oak Trees and wildlife. CFG-11

Sincerely,

Cherie A. Fitz-Gerald
380 Rim Rock Road
Nipomo, CA 93444
(805) 680-3753

Sent from Mail for Windows

2

9.5.90.1 Response to Letter from Cherie Fitz-Gerald

Comment No.	Response
CFG-1	This comment raises concern regarding the availability of water supply for the existing service area in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
CFG-2	This comment raises concern regarding the availability of water supply for the existing service area in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
CFG-3	This comment raises concern regarding an increase in commuter traffic and availability of emergency evacuation. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. Additionally, the project includes mitigation to support alternative modes of transportation to work and options to support remote work. Refer to HE-1, which addresses emergency evacuation comments.
CFG-4	This comment raises concern regarding the availability of water supply for the existing service area in addition to the proposed project. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
CFG-5	This comment raises concern regarding an increase in traffic along roads. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
CFG-6	This comment raises concern regarding the capacity of the LMUSD to serve the growth of school-aged children and associated safety concerns, including evacuation at schools. Refer to BR-6, which addresses comments related to public schools. In addition, refer to HE-1, which addresses emergency evacuation comments.
CFG-7	This comment raises concern regarding an increase in commuter traffic. Refer to CFG-3, which addresses this comment.
CFG-8	This comment expresses concerns related to the project's consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
CFG-9	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
CFG-10	This comment asserts that the County should improve interagency communication. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
CFG-11	This comment supports denial of the project based on impacts related to water supply, road infrastructure, and loss of oaks. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; and MR-3, BR-1, and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.

9.5.91 Jose Gomez

Jennifer Guetschow

From: Jose Gomez <jose_gomez_93444@yahoo.com>
Sent: Sunday, July 31, 2022 12:14 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Project - Reject please

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Please reject the Dana Reserve Project of 1200 plus housing units for the following reasons:

-Current lack of Police protection from the Oceano South Station. The EIR mentions that the Station would need to hire 21 deputies to meet the needs of the Nipomo area. JG-1

-Dana elementary is currently at 94% capacity without the addition of 1200 plus housing units. Nipomo High is currently at 145% capacity without the addition of 1200 plus housing units. JG-2

-The EIR omits the word "draught" and appears to ignore the current and future impact. JG-3

1

9.5.91.1 Response to Letter from Jose Gomez

Comment No.	Response
JG-1	This comment raises concern regarding the increase in demand on existing police protection services. Refer to MR-2 and KE-3, which responds to comments related to police protection services
JG-2	This comment raises concern regarding the capacity of the LMUSD to serve the growth of school-aged children. Refer to BR-6, which addresses comments related to public schools.
JG-3	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.92 Brian and Brenda Hascall

Jennifer Guetschow

From: Brian Hascall <bhascall@aol.com>
Sent: Sunday, July 31, 2022 5:59 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Preserve Project Comments

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,
My wife and I would like to express our opposition to the Dana Preserve project at this time.
While we are not fundamentally opposed to this project at some time in the future, we are currently in the grip of the worst drought to strike this area in modern history.
Most residents of Nipomo have been required to cut our water usage by 20% under pain of heavy fines and possible water meter restrictors being placed if we do not comply. This will most likely worsen without relief from the drought. The logistics of adding over 1300 water meters and the tremendous increase of use of ground water resources is unfathomable during this drought. We would request that this project be shelved until the drought issue is resolved and water supplies return to normal.
Sincerely,
Brian and Brenda Hascall
North Tejas Place
Nipomo

BBH-1

1

9.5.92.1 Response to Letter from Brian and Brenda Hascall

Comment No.	Response
BBH-1	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.93 Neil Havlik

Rcvd. 8.1.22

July 31, 2022

Ms. Jennifer Guetschow, Project Manager
County of San Luis Obispo
Department of Planning and Building
San Luis Obispo, CA. 93401

RE: Dana Reserve Specific Plan Environmental Impact Report

Dear Ms. Guetschow:

I appreciate the opportunity to comment on the Draft Environmental Impact Report (DEIR) on the above-captioned project.

The DEIR points out numerous shortcomings of this project, which is unnecessarily destructive of valuable natural habitat, will exacerbate the area's jobs-housing balance, and violate many existing County policies or require them to be changed simply to accommodate this project. All of these changes strike me as a classic case of the tail wagging the dog, and I wonder why such a course of action is even being considered. NHa-1

I will limit my main comments to the biological impacts of the project, and to certain the alternatives being considered (and not being considered). NHa-2

Loss of Oak Woodland and Associated Habitat is Excessive and Unnecessary. County policies call for protection of the oak woodlands of the Nipomo area, yet this project proposes to destroy some 4,000 oak trees (the number keeps growing) and associated habitat, including a rare local vegetation type known as Burton Mesa chaparral, with no real mitigation for such massive losses. NHa-3

The developer's proposal to dedicate a conservation easement over a piece of unrelated land miles away is not really mitigation. It does nothing to mitigate for the massive losses being proposed. Mitigation means to restore or replace that which is lost, and dedication of an easement does not plant or nurture one new tree to replace those lost. Planting of oaks as street trees is likewise not really mitigation. The loss is of a functioning habitat. It is not only trees that will be destroyed; it is the entire fabric of the ecological community. The pages of mitigation regarding the care for and caution around the fraction of the oak woodland that would be left on-site is comical in comparison to the destruction being countenanced. NHa-4

The DEIR proposal to locate, secure, and initiate the creation of an entirely new oak woodland on an unknown and unnamed site as mitigation is disingenuous at best. There is no location, cost estimate, or timeline for any such effort. Furthermore, the likelihood of success of such an effort can be questioned. Having been involved in many mitigation projects in my 40+ year professional career, I have seen such efforts range from complete success to complete failure; but unfortunately complete success is rare. One need look no farther afield than the efforts—still ongoing—to mitigate for the oak habitat losses occasioned by the nearby Willow Road extension project to see the challenges that can face such projects, particularly when poorly planned or poorly laid out. NHa-5

In similar manner, the DEIR proposes as mitigation to locate, secure, and initiate creation of a new population of Burton Mesa chaparral, hopefully on a property somewhere in the vicinity, but if not, somewhere in Santa Barbara County. Again, this effort has no location, no cost estimate, and no timeline either for its initiation or for its completion. Such a paper requirement does not constitute mitigation. In any case, requiring such mitigation before beginning of grading activities, but after approval of the subdivision of the land, is too late to ensure conservation on-site. Any such mitigation requirement should be imposed (and subject to bonding) prior to approval of the subdivision of the property, in order to ensure that mitigation in fact can and does take place. NHa-6

The author is aware of certain State legislation which permits the use of off-site dedications of land as suitable mitigation for losses incurred by a project. It is noted, however, that this law is permissive and not obligatory. It does not require a granting authority to accept such off-site dedications. In certain circumstances, for example, where vernal pools are being lost, such a law may make sense. This is because vernal pools require a strict conjunction of soils, topography, hydrology, and plant and animal life to be functional, and such conditions are extremely difficult to create artificially. NHa-7

In the current instance, the project sponsors are seeking many changes and exemptions to, and exceptions from, existing County policies on many fronts. The lead agency is reminded that it is under no obligation to accept any of them. NHa-8

In the case of Dana Reserve, a smaller project would easily avoid most of the impacts (avoidance being the first choice in mitigation), leave room on-site for mitigation of impacts which do occur, and would dispense with the need to locate and secure an off-site location to replace any losses. It would also benefit from the same soils, topographical, hydrologic, and climatic conditions as the areas being impacted. This makes much more sense than destroying the on-site oak habitats and then hoping to replicate them somewhere else at some future date. For these reasons, the choice of a smaller project, preserving the oak woodland, is the most beneficial way to move forward. NHa-9

Regarding Alternatives to the Project. The DEIR identifies several alternatives to the project as required by CEQA, but then proceeds to give each of them short shrift, claiming them to be unable to meet community objectives, or claiming them to be "infeasible". No compelling evidence is presented to back up many of these claims. NHa-10

The author is particularly surprised by the discussion of the so-called "Burton Mesa chaparral avoidance" alternative, or BMCA, which would avoid the great majority of impacts to the site's natural resources. It is stated that this alternative does not achieve the project objectives, and is not feasible, but without providing any explanation of why that is so. The author disagrees. Having reviewed the objectives listed, it is seen that this project would in fact meet all or nearly all of them. This alternative, though only about one-half of the size of the proposed project, would still be one of the largest developments proposed in the County in years. NHa-11

In January of this year the author, who had been invited to submit a concept for the site, did so, and that concept (which was quite similar to the BMCA alternative) would have had the full range of housing types found in the project; only the ratios were changed to emphasize the lower cost housing types, by removing the tract homes proposed where the oak woodland is. With the median home price in San Luis Obispo County now at (or exceeding) $900,000, this seems like a very good way to go. NHa-11

Suppose that the BMCA alternative had been the developer's proposal. Would it have been rejected by the County as infeasible? If so, why? This seems to be a spurious claim with nothing to back it up.

The same is true of other alternatives, such as the "non-native grassland" alternative, and the "rural cluster" alternative: both are stated to be feasible, and the rural cluster alternative is claimed to be the environmentally superior alternative as required by CEQA, but again there is little or no information to support either of these claims. In the author's view, the non-native grassland alternative has the disadvantage of cutting up the oak woodland into two smaller islands and placing all the surrounding areas into development. Thus, while this alternative would presumably leave the oak woodlands intact, they would be essentially islands surrounded by development, diminished in size, connectivity, and ecological value. In the case of the rural cluster alternative, no particular design or layout is presented, and much would depend upon such design to determine the nature and extent of the impacts. This leaves basically nothing to back up the assertion that this alternative is the environmentally superior one.

NHa-13

NHa-14

Recommendations. It is recommended that the DEIR be rejected as inadequate for its lack of specificity in identifying a location for the proposed mitigation for the tremendous and basically unacceptable losses to the oak woodland and chaparral habitats on the Dana Reserve site; and for its inadequate treatment of alternatives to the project which would greatly reduce the impacts of the project.

NHa-15

It is further recommended that the project be denied and the project sponsors be directed to resubmit a project that is more in line with existing County policies and which will be more environmentally benign. The BMCA alternative or something like it is the author's preferred alternative. That alternative could still be a large and complex project, but one that could help meet the housing needs of the County in a way more compatible with existing County policies and with the need to respect and conserve the great majority of natural environment of the area.

NHa-16

Thank you again for the opportunity to comment on this sadly misconceived project.

Neil Havlik

Neil Havlik, PhD.
672 Serrano Drive #11
San Luis Obispo, CA. 93405

9.5.93.1 Response to Letter from Neil Havlik

Comment No.	Response
NHa-1	This comment raises concern regarding the loss of natural habitat, the community's jobs-to-housing ratio, and inconsistency with applicable planning documents. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
NHa-2	This comment is an introduction to the topics that are discussed in the letter, including biological impacts and the alternatives analysis. Refer to MR-3, BR-1, and JK-4, which responds to comments related to biological resources and AG-3 and AG-4, which addresses comment related to the alternatives analysis. This comment does not require any changes to the EIR.
NHa-3	This comment expresses concerns related to the loss of oak woodland and Burton Mesa chaparral and the lack of adequate mitigation. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and Burton Mesa chaparral and the adequacy of proposed mitigation.
NHa-4	This comment raises concern regarding adequacy of the off-site mitigation area as a mitigation measure. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and proposed mitigation.
NHa-5	This comment raises concern regarding adequacy of the off-site mitigation area as a mitigation measure. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and proposed mitigation.
NHa-6	This comment raises concern regarding adequacy of the mitigation for Burton mesa chaparral habitat. Refer to MR-3 and KK-19, which addresses comments related to Burton Mesa chapparal and associated mitigation and performance standards.
NHa-7	This comments states that the author is aware of State legislation that permits the use of off-site dedications of land as suitable mitigation for project impacts and states specific language of this legislation. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
NHa-8	This comment expresses concerns related to the project's consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
NHa-9	This comment asserts that a smaller project would reduce the project's significant impacts. Refer to AG-3 and AG-4, which addresses comment related to the alternatives analysis.
NHa-10	This comment raises concern regarding the adequacy of the alternatives analysis. Refer to AG-3 and AG-4, which addresses comment related to the alternatives analysis.
NHa-11	This comment asserts that the Burton Mesa Chapparal Avoidance alternative is prematurely dismisses and inadequately evaluates the alternative in comparison to project objectives. As discussed in Chapter 5, *Alternatives Analysis*, this alternative would not provide a diversity of housing types, including affordable homes, and would not connect on-site residential neighborhoods to the community through development of pedestrian, bicycle, and equestrian trails via Collector B and an on-site trail system in the majority of the Specific Plan Area, and would not meet most of the basic project objectives. This alternative may also be infeasible from a cost perspective. Based on the substantially reduced project footprint, increased density, and more compact design, the Burton Mesa chaparral avoidance alternative would accommodate an increased number of multi-family units and a decrease in single-family units compared to the proposed project. Single-family units would be reduced from 831 to 111 and multi-family units would be increased from 458 units to 704 units. Not only does this not meet the basic project objective of providing a range of housing types, including affordable housing, workforce housing, and affordable by design housing, based on market studies conducted by the project applicant, the Nipomo area does not have adequate demand for the number of multi-family units. Further, the reduced number of units and utility connections makes expansion of NCSD infrastructure to serve the site more expensive per unit, increasing the challenges of providing affordable housing within the Specific Plan Area. Since this alternative does not meet the basic project objectives, is likely infeasible, and has the potential to generate new potentially significant impacts, this alternative was eliminated, consistent with State CEQA Guidelines Section 15126.6(c). In addition, refer to AG-4, which addresses comment related to the alternatives analysis. Refer to MR-3, which provides a detailed response related to Burton Mesa chapparal. As this alternative is discussed and dismissed in the EIR, no changes to the environmental document are necessary.

Comment No.	Response
NHa-12	This comment states that the Burton Mesa Avoidance alternative would not be dismissed as "infeasible" if it were the Applicant's original proposal. This comment does not identify any deficiency of the EIR, and no changes to the environmental document are necessary. Refer to NHa-11 for a detailed discussion of the Burton Mesa Avoidance alternative.
NHa-13	This comment asserts that additional analysis is necessary to support the conclusions of Alternatives 3 and 4 identifies in the alternatives analysis of the EIR. Refer to AG-3 and AG-4, which responds to comments related to the alternative analysis and KK-21, which addresses comments related to the use of figures in the alternatives analysis.
NHa-14	This comment asserts that Alternative 3 does not include a specific site design, which would be necessary to support conclusions of this analysis. Refer to AG-3 and AG-4, which responds to comments related to the alternative analysis and KK-21, which addresses comments related to the use of figures in the alternatives analysis.
NHa-15	This comment recommends rejection of the DEIR based on the lack of mitigation for the loss of oak woodlands at the project site and the inadequate evaluation of the alternatives analysis. Refer to JK-4, which addresses comments related to the loss of oak woodlands and the associated mitigation and AG-3 and AG-4, which addresses comments related to the alternatives analysis.
NHa-16	This comment recommends denial of the proposed project based on inconsistency with applicable planning documents and significant environmental impacts and suggests adoption of an alternative that would reduce impacts to Burton Mesa chaparral. Refer to ES-3, which addresses comments related to applicable planning policies;DT-2, which addresses comments related to the project's significant impacts; and MR-3, AG-3, and AG-4, which responds to comments related to project alternatives.

9.5.94 Nick Hernandez

From: Nick Hernandez <nickthequick805@outlook.com>
Sent: Sunday, July 31, 2022 10:13 PM
To: Jennifer Guetschow
Subject: [EXT]New Nipomo development

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

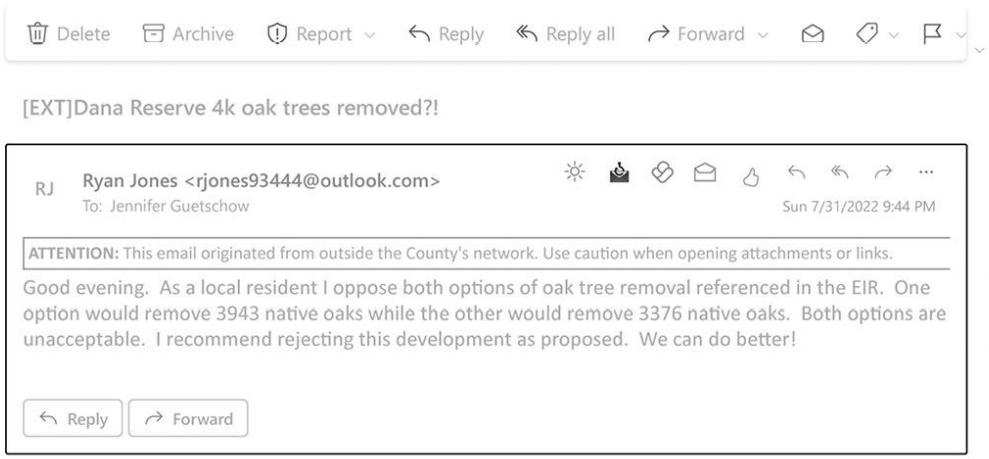
As a low-income resident, I oppose the addition more upper income housing that only rich retirees can afford. Do I need to move to Santa Maria now to be able to afford the rent? Please kill this Dana Reserve development for the sake of all low income residents in south county. NHe-1

-N

9.5.94.1 Response to Letter from Nick Hernandez

Comment No.	Response
NHe-1	This comment raises concern over the affordability of the proposed housing development. An objective of this project is to provide affordable homes to the community, which is possible through the density of the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.95 Ryan Jones



RJ-1

9.5.95.1 Response to Letter from Ryan Jones

Comment No.	Response
RJ-1	This comment raises concern regarding the removal of oak trees. Refer to MR-3, JK-4, and BR-1, which addresses comments related to biological resources, including loss of oaks.

9.5.96 Herb Kandel

July 31, 2021

This letter addresses the oak tree mitigation portion of the Dana Reserve Specific Plan. I request that this be entered into the public record and that each question within my letter be addressed thoroughly.

1. Two prior county approved oak mitigation projects close to the current proposed Dana Reserve Project (Willow Road Extension Oak Tree Mitigation and the Mesa Meadows Oak Mitigation) had significant issues. Both mitigations were implemented in sub-optimal locations, had significant installation and maintenance problems, and were inconsistently managed and monitored. This is documented in the County's report (1) for the Willow Road Extension. The Willow Road Extension met the qualitative mitigation targets by the very narrowest of interpretations, and met quantitative measures only though costly rescue efforts by the County, and in the case of the Mesa Meadows phase one Osage Road mitigation the project has grossly sub-standard implementation and monitoring and a failure to meet or properly measure the mitigation criteria (2). These are not the only examples within the county of poor performance by the county's own standards. Please account for these errors and disclose for the public records how the prior mitigation projects performed both qualitatively and quantitatively. Please state what has changed about the County mitigation program that will apply to this current proposed project?
2. Does the county oak tree mitigation program account for our up-to-date understanding of the roll of mature oak trees in carbon sequestration? How does this project account for the loss of the essential role of carbon sequestration for the removal of heritage oak woodland, given that replacement planting even if successful will not be at the current levels for over one to two hundred years? The amount of carbon sequestration per mature tree and per acre of woodland is higher than we previously understood, see reference (3). Do the county's policies attend to current urgency of timelines and targets for carbon emissions reduction? If so, how is this addressed in the environmental mitigation component of this project? Will the county commit to sending its staff to the upcoming 8th annual California Oak symposium in San Luis Obispo Oct. 31-Nov 3 presenting the latest science to help direct policies for protection and mitigation? Will our elected official attend? The developer is also encouraged to attend. Let's learn together and improve this project design. The link is listed below (4). Also the organization includes study references demonstrating this important connection and assisting with calculations (5): Please address specifically how you will include calculations of impacts to measure the loss of carbon storage with the removal of the oak woodlands in this project.
3. The understory of the Oak woodlands and remnants of Burton Mesa Chaparral have remained surprising intact and have returned with a persistence I could not have imagined despite deliberate and concerted efforts by prior owner(s) to eradicate it. (6) Science continues to discover more about how much cooperation between trees and associated understory plants takes place. Many burls of the Shagbark Manzanita (Arctostaphylos [purissima rudis), survived the tractor blade, as did some of the unique narrow endemic Nipomo Mesa ceanothus (Ceanothus impressus var. nipomensis). There are other unique species—which are now very hard to find on the Nipomo mesa due to development impacts—that still exist on this property, such as Sand Almond, and of course the Pismo clarkia, sadly only a remnant of a once more abundant, special status plant. I estimate within the current woodlands some 40% of the original density from the 90s had returned. Unfortunately, much of the Burton Mesa Chaparral has been cleared from the open field areas and native grasses disappeared long ago. These species become more and more rare—and current science emphasizes the relative importance of the understory for both oak health and habitat. Explain how the disturbed understory will be addressed in mitigation. The design has insufficient border between the Oak woodland remnant that remains in the current version of the plan and a buffer area that will support restoration of Burton mesa chaparral. A foremost national expert of the the Oak Understory and Maritime

HK(1)-1

HK(1)-2

HK(1)-3

HK(1)-4

Chaparral species lives in Nipomo, I recommend he be consulted to review the mitigation specific to these components. (7) HK(1)-4 (cont'd)

4. The current project must be re-designed with less density to protect as much of the dense Oak woodlands as possible and to protect a larger swath of buffer area around the oak woodland to protect both the trees and to provide space to protect and mitigate for losses of the Burton Mesa Chaparral and Oak. Also the project re-design should make a real effort to preserve the scattered oaks, which will provide bird habitat and give some ambiance to the new development. These changes to the plan are essential to preserve existing habitat for the many species of flora and fauna that currently reside and depend on the oak woodland community. Importantly, your EIR includes "species observed or have the potential to occur in the project area". Well done including this list— this speaks to both the habitat potential, as well as the seed bank and future potential for species to return. As noted above, so much intentional eradication efforts have taken place— the species that remain and can return are a testament to the importance of value of this site biologically. The EIR report reports the minutia of what will be lost, and existing techniques and measures that are seriously inadequate to mitigate for these losses. Plead in your EIR in plain language for the layperson, and for our elected officials and those who read this document in the future, what this version of the plan sacrifices. Make a strong recommendation for a project redesign that prioritizes the growing importance of our Oak Woodlands at this critical time in our history. HK(1)-5

Herb Kandel
776 Inga Road, Nipomo

NOTES:

(1) Jan 2020, Annual Monitoring report for the Willow Road Extension/101 Interchange Oak woodland Habitat Project at the Dana Adobe Historic Park, Page 21— The county no longer is monitoring this project. The 2020 number of oaks in the lower two categories of vigor ranking was 52%. The project has completed its supplemental irrigation phase. In the first years of the project the oak mortality loss was 58%. The report states, "Mitigation efforts were derived with limited institutional knowledge of Oak Woodland restoration, inexperienced contractors, multiple issues with water quantity and delivery, drought and other contributing factors." Only by a costly County funded replanting of the losses and infrastructure and staff investment has the number of surviving oak met the absolute minimum quantitative standard. The probability of droughts ahead, and the absence of oaks at this location historically create ongoing risks for the success of this mitigation. HK(1)-6

(2) I was personally approached to assist the developer of the first phase of the Mesa Meadows project, in 1999 where heritage oaks and well established Burton mesa Chaparral were slated for removal. As part of that mitigation, a local girl scout troop was paid $500 and volunteers were engaged in the plantings along the steep graded bank of Osage road and near the current location of the Caesar Chavez Native Garden. I was among those volunteers. I regret my involvement, but bore witness to severe disfunction in the County Mitigation program at that time. Less than 10% of the original planting survived. HK(1)-7

(3) The Minnesota Extension demonstrated a single 24 inch tree sequestered 846 pounds of carbon during its growing season. And an acre of woodland during just one month stored 18.4 tons of carbon during May peak season and additional 3.9 tons in September. In May, this woodland stored 18.4 tons of carbon per acre. By September, it sequestered an additional 3.9 tons of carbon per acre. This carbon sequestration amount is equivalent to: HK(1)-8

- The greenhouse gas emissions from 32,000 miles driven by a typical passenger vehicle.

- The CO2 emissions from 1,200 gallons of gasoline.
- And the CO2 emissions from charging 1.5 million smartphones.
- Source: https://extension.umn.edu/news/2021-tree-and-woodland-carbon-capture-challenge-results
- Additional resources demonstrating connections on California woodland and the role of carbon sequestration.

HK(1)-8 (cont'd)

(4) https://ucanr.edu/sites/oaksymposium/
(5). http://climate.calcommons.org/article/carbon-sequestration
(6). I took photos of the property in the 1990s when the density was much higher. Multiple efforts at clearing, including with tractor blading very close to trees was even unsuccessful. This clearing was in anticipation of a plant survey for a prior development proposal. I spoke with the prior owner respectfully suggesting management practice consistent with his ranching uses. His written response was, "when you write me a check for 6 million dollars you can manage the scrub brush any damn way you please."
(7). Dave Fross, author California Native Plants for the Garden.

HK(1)-9

9.5.96.1 Response to Letter from Herb Kandel

Comment No.	Response
HK(1)-1	This comment asserts that two other mitigation projects have experienced significant issues and states that these mitigation projects have been close to failing to meet established mitigation targets. Refer to MR-3 and JK-4, which addresses comments related to the loss of oak trees and associated mitigation.
HK(1)-2	This comment raises concern over the loss of oak woodlands at the project site and associated reduction in carbon sequestration. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. Additionally, refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
HK(1)-3	This comment raises concern over the loss of oak woodlands at the project site and associated reduction in carbon sequestration. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. Additionally, refer to Gro-3, which responds to comments related to air quality and greenhouse gas emissions.
HK(1)-4	This comment raises concern regarding the loss of oak woodland and natural habitats at the project site, in addition to concern related to the adequacy of proposed mitigation. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and associated mitigation and BR-1, which addresses comments related to habitat loss and wildlife.
HK(1)-5	This comment expresses the need for an alternative site layout to address the loss of oak woodlands at the project site and asserts that the loss of oak woodlands needs to be clearly stated in the EIR. Refer to AG-3 and AG-4, which addresses comments related to project alternatives. In addition, refer to MR-3 and JK-4, which addresses comments related to the project's Class I impacts as a result of the loss of oak trees at the project site.
HK(1)-6	This comment raises concern over the ability to support mitigation efforts for the loss of oak woodlands at the project site during drought conditions. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak woodlands at the project site and associated mitigation and MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply.
HK(1)-7	This comment identifies this commenter's background in assisting the County with mitigation projects and asserts that less than 10 percent of mitigated trees survived. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak woodlands at the project site and associated mitigation. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
HK(1)-8	This comment identifies that the loss of oak woodlands at the project site would substantially reduce carbon sequestration. Refer to GRO-3, which responds to comments related to greenhouse gas emissions.
HK(1)-9	This comment identifies previous vegetative clearing at the proposed project site. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.97 Ken Marschall

Jennifer Guetschow

From: Ken Marschall <marschallken@gmail.com>
Sent: Sunday, July 31, 2022 5:37 PM
To: Jennifer Guetschow
Cc: District 4; Carla
Subject: [EXT]Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer Guetschow, Department of Planning and Building

My family and I are residents of Nipomo, and our address is 551 Miles Oak Ln, Nipomo, CA 93444. We strongly believe the social and economic benefits of the Dana Reserve Project will not outweigh the impacts of this project for a number of reasons. Please reconsider this project and develop alternatives which do not have a severe impact on our environment and natural resources in Nipomo. KM-1

Project Concerns:

Biological Resources:

Six Class I impacts to Biological Resources are identified in the Draft EIR: Impacts to special status plant and wildlife species; impacts to watch list plant species; loss of 35 acres of Burton Mesa chaparral; loss of 75 acres of oak woodland and 21.7 acres of oak forest (categorized as 2 impacts, including loss of 3,948 oak trees); and cumulatively significant impacts. We believe the Draft EIR fails to address these adequately; there may be additional Class I impacts, such as to Pismo Clarkia, in which mitigation measures for replanting has not been successful in the past. KM-2

Allowing Burton Mesa chaparral mitigation outside SLO County, or even off the Nipomo Mesa, is inadequate mitigation, considering these habitats are not adjacent other the project site. KM-3

The developer is not environmentally responsible because he is preserving the oaks in the middle of the project site, and buying a hill top parcel (Dana Ridge) with oak trees. Neither of these locations are really developable, and the Dana Ridge is not an appropriate mitigation site for loss of oaks and Oak Woodland (Impacts BIO 15 and 18 in the DEIR). If this project is approved as is, in the future, developers will continue to clear large swaths of trees in prime habitat for oaks and other sensitive species, in favor of undesirable locations on the fringes of where oaks can survive, leading to a total net loss of oaks in the county. This will undermine the existing Oak Tree Ordinance for all future developments to come in the county and cause the loss of this sensitive and very important community within the county. KM-4

There is a way to reduce the impacts to onsite oaks and rare plants and habitats, look at additional alternatives where housing is reduced. This project is overly packed with homes, to the determent of the biological resources on-site. Reduce the overall amount of houses in each neighborhood, maintain linkage of the native habitats left onsite. Pick Alternative 3, have the county provide maps and additional rationale for Alternatives 2, 4, and 5, or formulate other alternatives that reduce the overall amount of homes and necessitate a smaller project. KM-5

Land Planning:

In the EIR it's stated that "The County's South County Area Plan includes an outline for future development of La Canada Ranch on the project site, which identified the following land uses in order of priority:
open space uses,
industrial park(s) retail uses,
commercial retail uses, and residential areas.
The prioritization of these land uses show that preservation of on-site oak woodlands and development of job-generating commercial and industrial uses were intended to be the primary focus of future development on-site for La Canada Ranch." KM-6

1

This project does not follow the South County Area Plan. The preservation of the oaks trees and open spaces uses was to be the first priority in types of uses. If we were to follow the south county plan, Alternative 3 is the most beneficial alternative and reduces the overall class 1 impact for oak woodlands, which was the conservation priority per the County. Additionally, it would focus on rectifying the jobs/housing unbalance within Nipomo, vs increasing this imbalance with the current project. **KM-6 (cont'd)**

Despite Planning Commissioner Don Campbell saying neighboring houses on acreage should "get over" having high density housing immediately adjacent to their properties during the July 14th public meeting, there are real concerns from neighbors on these lots when the zoning for the neighboring property is proposed to be changed from Rural Residential (RR) to Single Family (SFR) or Multi Family Residential (MFR) zoning.

Neighbors adjacent to this project have roosters, chickens, horses and cattle, despite Don's comments that this area "is not AG", these residences are allowed these animals in certain densities on their land. Unfortunately, new families moving into these SFR and MFR lots may not be so understanding of these animals. In many cases, the only space between these lots is a 15 ft setback with an equestrian trail. Although this equestrian trail is an amenity of the project, the buffer will not be enough to prevent the future conflicts that will occur between these lots with drastically different zoning on the other side. We need to see a redesign of the development plan to include less housing along the perimeter of the neighborhoods in order to mitigate this zoning discrepancy. **KM-7**

This model of viable commercial sites within the mixed use space has not worked locally. Trilogy is one example. Fifteen years later Shea is still trying to find a workable solution for the land that was proposed to be a hotel, and other amenities/businesses (and we are speaking about an experienced developer). Dignity Health and an investment firm office are the only takers so far. The Dana Reserve project developer described the mixed use buildings to be exactly what Trilogy promised to its home buyers. How will that look if the developer sells these amenities only to have them fall through? Especially since this project already has a housing/jobs imbalance. Additionally, the flex commercial area is small in comparison to the rest of the development. Nipomo has been classified within the EIR as a "housing rich area" and the the "South County Area Plan" identified an industrial park and retail uses as the secondary priority, however, this land use is woefully small compared to the housing proposed. Alternative 3 better aligns with this plan, but alternatives not included within the EIR include smaller areas of development would be better suited for this parcel. **KM-8**

Water:

The EIR itself states that although water allocations from the NCSD should exceed buildout of the project, "the specific timing of buildout of the DRSP is not currently known and the reliability of future water supply is uncertain due to the potential for prolonged periods of drought and increasing water demands due to population growth."

In the project's own EIR, they are concerned that the drought will exceed the stage V drought analysis, so much so that in order for the developer to develop each stage, water allocations will have to be deemed sufficient or development will be paused. **KM-9**

However, despite all the work to bring water into the new development, a solid water recycling line plan to supplement water resources was not developed for this project. If we build a new development in a water parched area, we should include all water saving measures at our disposal, not just leave it to chance that the developer will do it when the time comes. A water recycling plan for the community and recycled water line should be included in the project as was included for trilogy and Cypress Ridge.

Public Facilities:

The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further contribute to this exceedance, which would impact the experience for all existing Nipomo residents.

Additionally, this development is within the Lange Elementary boundary, which doesn't have the capacity for all students expected to attend, so the EIR states its likely all of these students will need to go to Nipomo Elementary. This school is on the other side of the freeway, and it's likely that this will cause additional backup on either North Frontage and Tefft or Thompson as most kids will be picked up and dropped off. The EIR consultant stated during the July 14th call that Lucia Mar Unified School District (LMUSD) had concerns about this plan, but that fees mitigated this concern under CEQA. However, additional alternatives to this development plan, which would reduce the overall amount of homes on-site would help to alleviate LMUSD's and existing residents' concerns. **KM-10**

Although the development of a park in the middle of the development seems like an amenity, County Parks comments in the EIR state that "the proposed park site is too small and encumbered with drainage features that should not count **KM-11**

2

toward acres used for park land" with regards to the CEQA analysis.
Additionally, the developer requested that a Quimby Fee credit for conveyance of the park land to the County be waived. However, County Parks stated that "a waiver of Quimby Fees would mean the long-term maintenance of the park would not be adequately accommodated."
How can we let a developer propose a park, then not help pay for the long term maintenance? If Quimby fees are not paid, does the developer expect that long-term maintenance of the park will be paid out of HOA fees as discussed in the Dana Reserve Specific Plan? How does this affect the costs incurred by the affordable housing residents on-site?

KM-11 (cont'd)

Affordable Housing:

With regard to affordable housing, there are many amenities within the development that are proposed that would be beneficial. However, these amenities come with a cost. As stated in the Dana Reserve Specific Plan, HOA's would be used for long term maintenance of facilities.
As we know, HOA fees typically go up over a period of time. Add in the requirements for long term maintenance of pocket parks, central park, and equestrian trail as well as all electric homes to mitigate GHG and air emissions, there may be many hidden costs for those residents we are hoping to provide this housing to, so much so, can we say that the operating costs of these houses will be affordable?
Additionally, it's stated that the starting cost range for these homes will be $600k. In the July 14th Kristina Simpson-Spearman had concerns over who this development would house with that starting price.

KM-12

Transportation:

All of the amenities for Nipomo are accessed by using Tefft st. This project's access to Willow Road and the extension of North Frontage will do little to ease the traffic flowing to Tefft street as the additional 4,500 plus new people to Nipomo need these same services. The Nipomo Swap Meet on North Frontage road causes huge backups on Mary street and Tefft as people enter and exit on Sundays, so much so that additional enforcements on that day are needed just to keep all traffic flowing on Tefft street. There are no additional improvements planned for North Frontage which doesn't currently have a bike lane and has limited walkability due to poles and hydrants located within the sidewalk. Amenities along this road should be improved to accommodate lowered vehicle miles travelled (VMT) and increase walkability and bike ability as part of adherence to the South County Area Plan.

KM-13

The increased traffic from this development will cause safety hazards at the Project's entry and exit to Pomeroy, which currently has no designed stoplight. Hazards will also occur at Camino Caballo's entry and exit to Pomeroy, which has limited visibility and is difficult to access due to speeding cars. Same issue at Pomeroy and Sandydale. A fatality in 2019 on the blind curve highlights the safety concerns with additional traffic for residents trying to turn left onto their street without a dedicated left turn lane. Improvements at these intersections should be incorporated into the plan.

KM-14

As stated in the EIR, the majority of people in Nipomo commute north or south on Highway 101 to work. This large development is only going to exacerbate the backup on 101 as it is inevitable that the head of household jobs needed to afford the 600k starting price for these new homes will not be made up with the likely low paying service jobs created by this project. Unfortunately for Nipomo, Cal Trans deemed this area too rural for improvements on this section of highway.

KM-15

In Summary, do not let a developer get away with an overly ambitious project that has 6 significant class 1 impacts, the social and economical benefits do not outweigh the negatives.

KM-16

Best regards,

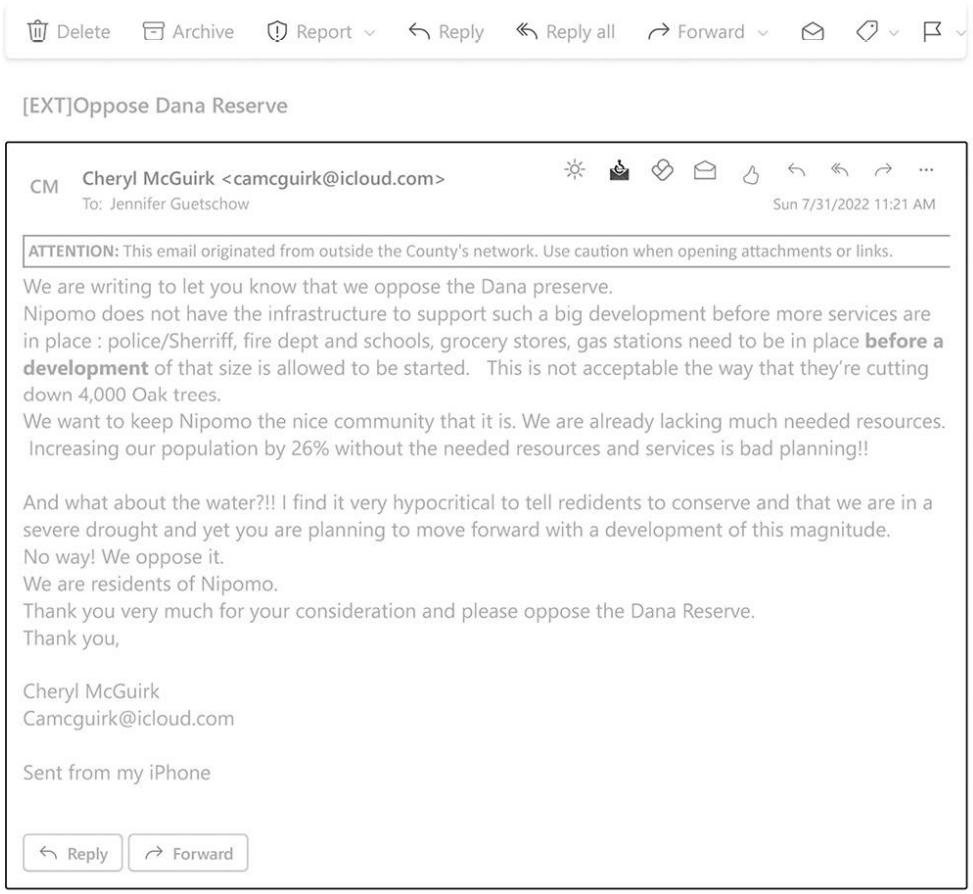
Ken Marschall
Resident of Nipomo

3

9.5.97.1 Response to Letter from Ken Marshcall

Comment No.	Response
KM-1	This comment provides background on this commenter and expresses concern related to social and economic benefits. The comment requests reconsidering this project and to develop alternatives that reduce impacts on the environment. Refer to CE-3, which addresses comments related to social and economic impacts and AG-3 and AG-4, which addresses comments related to the alternatives analysis.
KM-2	This comment expresses concerns related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
KM-3	This comment raises concern regarding adequacy of the mitigation for Burton Mesa chaparral habitat. Refer to MR-3 and KK-19, which addresses comments related to Burton Mesa chapparal.
KM-4	This comment expresses concerns related to the loss of oak woodlands at the project site, which is inconsistent with the County' Oak Woodland Ordinance. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and ES-3, which addresses comments related to applicable planning policies.
KM-5	This comment asserts that project alternatives should reduce impacts to biological resources at the project site. Refer to AG-3 and AG-4, which addresses comments related to project alternatives.
KM-6	This comment asserts that the proposed project is inconsistent with the South County Area Plan and identifies that Alternative 3 is the most beneficial project alternative. Refer to ES-3, which addresses comments related to applicable planning policies. Additionally, refer to AG-3 and AG-4, which addresses comments related to the alternatives analysis.
KM-7	This comment expresses concern related to the change in the rural character of the project area. Refer to PH-1, which addresses comments related to consistency with the rural character of the project area and visual consistency.
KM-8	This comment asserts that the proposed project is inconsistent with the South County Area Plan and identifies that Alternative 3 is the most beneficial project alternative. Refer to ES-3, which addresses comments related to applicable planning policies. Additionally, refer to AG-3 and AG-4, which addresses comments related to the alternatives analysis.
KM-9	This comment raises concern regarding the availability of water supply for the proposed project and asserts that a recycled water line should be included in the project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions and KK-16, which responds to comments related to installation of a recycled water line.
KM-10	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.
KM-11	This comment raises concern regarding recreational facilities and the request to waive associated fees. Refer to KK-10, which addresses this comment.
KM-12	This comment raises concern regarding affordable housing. Refer to KK-11, which addresses comments related to affordable housing.
KM-13	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
KM-14	This comment expresses concern related to an increase in vehicles along local roadways and associated roadway hazards. Refer JK-6, JK-7, and DMW-1, which addresses these comments.
KM-15	This comment expresses concern related to an increase in traffic congestion along US 101. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
KM-16	This comment expresses concerns related to the project's Class I impacts in addition to social and economic impacts. Refer to DT-2, which addresses comments related to the project's significant impacts and CE-3, which addresses comments related to social and economic impacts.

9.5.98 Cheryl McGuirk



Delete Archive Report Reply Reply all Forward

[EXT]Oppose Dana Reserve

CM Cheryl McGuirk <camcguirk@icloud.com>
To: Jennifer Guetschow
Sun 7/31/2022 11:21 AM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

We are writing to let you know that we oppose the Dana preserve.
Nipomo does not have the infrastructure to support such a big development before more services are in place : police/Sherriff, fire dept and schools, grocery stores, gas stations need to be in place **before a development** of that size is allowed to be started. This is not acceptable the way that they're cutting down 4,000 Oak trees.
We want to keep Nipomo the nice community that it is. We are already lacking much needed resources. Increasing our population by 26% without the needed resources and services is bad planning!!

And what about the water?!! I find it very hypocritical to tell redidents to conserve and that we are in a severe drought and yet you are planning to move forward with a development of this magnitude.
No way! We oppose it.
We are residents of Nipomo.
Thank you very much for your consideration and please oppose the Dana Reserve.
Thank you,

Cheryl McGuirk
Camcguirk@icloud.com

Sent from my iPhone

Reply Forward

CMG-1

CMG-2

CMG-3

9.5.98.1 Response to Letter from Cheryl McGuirk

Comment No.	Response
CMG-1	This comment raises concern regarding an increase in demand on public services and impacts to oak trees. Refer to KE-3, which responds to comments related to public services and MR-3, BR-1, and JK-4, which addresses comments related to habitat loss and wildlife.
CMG-2	This comment raises concern regarding the population growth associated with the proposed project. Refer to BR-2, which addresses comments related to population growth.
CMG-3	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.99 Dan and Alyssa Peterson

Dan and Alyssa Peterson
781 Ridge Road
Nipomo, CA 93444

July 31, 2022

Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408
jguetschow@co.slo.ca.us

RE: Dana Reserve Project

Dear Ms. Guetschow,

"The impacts from the Dana Reserve Project will **certainly** ~~not~~ overcome the social and economic benefits of the project." We have not written this phrase exactly as it was stated in the letter we received, but the statement we were told to include seemed to include a typo that caused it to state the opposite of what was intended. The negative impacts of this project far outweigh any suggested benefit. The project seems only to benefit the developer in the form of income, the county in the form of new property tax revenue and to some extent the potential new residents that don't know Nipomo as it is now. Overall, the approval of this project seems rooted in greed rather than the best interest of Nipomo residents. There is no benefit to any of the current residents of Nipomo. DAP-1

We have been residents in the county for nearly 20 years, and have been residents of Nipomo for nearly 10 years. We chose Nipomo because the of rural, small-town feel, the open land that still existed with its beautiful oak trees and native landscape, and its lack of traffic and congestion. We moved into our house on Ridge Road in 2017 due to its location away from any large congested neighborhoods and its vicinity to the open areas around it. We also consciously chose to purchase a house that already existed instead of open land to build on so as not to add to the population of Nipomo solely because we do not want to change the way it is. The idea of a 4500+ resident housing development being built at the end of our road (touching Hetrick) is deeply distressing as it will be changing Nipomo and our immediate neighborhood into exactly what we were trying to escape when we moved here. DAP-2

Increasing the population of Nipomo by 4500+ people will have an enormous and negative effect on the town's roads and resources. According to the census, the population increased by 1468 people in the ten years between 2010 and 2020 (an 8.8% increase). If the Dana Preserve Project is approved, the population will be increasing by 24.75% from the Dana Project alone, not to mention the other already approved homes being built in Trilogy and other individual plots of land. This is a huge increase in population that will greatly affect the current residents of our town. Turning onto Willow or Pomeroy from our neighborhood and navigating Tefft to DAP-3 DAP-4

get to the grocery and hardware store and gas stations is already difficult as the roads are not even suitable for the population that already exists in Nipomo. In addition to the traffic and congestion our roads will experience, the water levels in the town will continue to drop. The Key Wells Index has been in the "severe" category for the last eight years and has dropped steadily for the past three years in a row. Adding 4500+ residents will certainly cause that to continue dropping and is hard to see this as anything but irresponsible when we're already stuck in a severe water level situation.

DAP-4 (cont'd)

DAP-5

In addition to the atmosphere and resources of the town and our immediate neighborhood, we are greatly concerned about the impact it will have on our daughter's education. With 4500+ residents moving within the same school system, the schools our now-2-year-old daughter will attend will be much more impacted, leading to less individualized attention to each student and a degree of disorganization and lack of infrastructure while trying to adjust to the extra students. The ratings for the Nipomo public schools are already on the lower end of the scale, and adding the stress of more students will only make progress in the right direction more difficult.

DAP-6

We ask that you please consider all of these points and the many more that the other residents of Nipomo will share. If this project is approved, the rural small town feel and open land with all of the beautiful oak trees and native plants will be turned into asphalt and concrete and houses filled with people that will make our roads more even more difficult to travel, our shops more difficult to access and our already critically low water level even lower. That is not the Nipomo that the current residents moved to and not the place we want to continue to live and raise our families.

DAP-7

Thank you very much for your attention.

Sincerely,

Dan Peterson and *Alyssa Peterson*

cc: Lynn Compton, County Board of Supervisors
district4@co.slo.ca.us

9.5.99.1 Response to Letter from Dan and Alyssa Peterson

Comment No.	Response
DAP-1	This comment expresses concerns related to social and economic impacts and availability of water supply. Refer to CE-3, which addresses comments related to social and economic impacts.
DAP-2	This comment expresses concerns related to the density of proposed housing and consistency with the existing rural character of the project area. Refer to MMe-1, which addresses this comment.
DAP-3	This comment raises concern regarding the population growth associated with the proposed project. Refer to BR-2, which addresses comments related to population growth.
DAP-4	This comment expresses concern related to an increase in vehicles along local roadways and associated roadway hazards. Refer JK-6, JK-7, and DMW-1, which addresses these comments.
DAP-5	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DAP-6	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.
DAP-7	This comment asserts that the proposed project would be inconsistent with the rural nature of the existing community. Refer to PH-1, which addresses this comment.

9.5.100 Julie Pinozzotto

Jennifer Guetschow

From: Julie Pinizzotto <pinizzottoj@yahoo.com>
Sent: Sunday, July 31, 2022 9:28 PM
To: Jennifer Guetschow
Subject: [EXT]Public Comment Opposing the Dana Reserve Development Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Jennifer Guetschow ,

I came to live in Nipomo from Tustin, CA and left the area because I had to watch the Irvine Company systematically destroy the beauty of Orange County with overdevelopment. They spared nothing! No tree, no plant, no animal. I watched as they mowed down mature avocado trees for homes. Avocado trees which could have been incorporated in the landscape. I moved to San Luis Obispo County because of the slow growth and the consideration for maintaining the integrity of the county. I am currently working in the Finance Department of the City of San Luis Obispo, and love our county. Our County has charm like no other in California. We think differently here. Everything has always been done with thoughtfulness and excellence. JP-1

As a resident of Nipomo for 15 years, I would like this opportunity to express my opposition to the Development of the Dana Reserve. "Up to 1289" residential units is TOO MANY for the 1/2 mile space. This large of development will overwhelm the resources available to Nipomo, and also destroy habitat to hundreds of animals which make Nipomo, Nipomo! Hundreds of beautiful oak trees being destroyed along with endangered plants and animals. JP-2 JP-3

Since the Triology project went in, traffic on Teft is horrible. Nipomo residences want to keep Nipomo rural! Please take seriously the voices of the residences of Nipomo, and stop this project or at the very least reduce the number of units to be built on this space, and consider working into the plan the oak trees so the wildlife will not be displaced or destroyed. JP-4

There can be a solution which the developers and Nipomo residence can agree upon which will keep Nipomo's old town charm and respect the residence and all life in this area. JP-5

My hope for this San Luis County is integrity in all it's dealings, slow and smart growth which is considerate and represents our wonderful county well. Let us work together to keep this county beautiful in every way. JP-6

Thank you for your hard work.

Sincerely,
Julie Pinizzotto
750 Amber Way
Nipomo, CA 93444

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9.5.100.1 Response to Letter from Julie Pinozzotto

Comment No.	Response
JP-1	This comment identifies this commenter's background in regard to the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
JP-2	This comment expresses this commenter's opposition to the proposed project based on the density of proposed development and strain on existing community resources. Refer to BR-2, which addresses comments related to population and housing growth and DR-3, which addresses comments related to community resources.
JP-3	This comment expresses this commenter's opposition to the proposed project based on loss of oak trees, and native habitat. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and BR-1, which addresses comments related to habitat loss and wildlife.
JP-4	This comment raises concern regarding traffic congestion along Tefft Street and asserts that an alternative design should be considered which reduces impacts to biological resources. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. In addition, refer to AG-3 and AG-4, which addresses comments related to project alternatives.
JP-5	This comment states that there can be a solution which maintains the rural nature of the area and respects members of the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration. In addition, refer to AG-3 and AG-4, which addresses comments related to project alternatives.
JP-6	This comment expresses this commenter's hope for slow and smart growth of the county. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.101 Natalie Rozier

Jennifer Guetschow

From: Natalie Rozier <natalierozier@gmail.com>
Sent: Sunday, July 31, 2022 6:50 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve EIR comments

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,

I am writing to you regarding the proposed Dana Reserve development in Nipomo, CA and the recent Draft Environmental Impact Report (DEIR). It is clear from reading the DEIR that the negative impacts resulting from the Dana Reserve Project will NOT overcome the economic benefits of the project. The Dana Reserve proposal is a cash grab by developers who have prioritized profits by proposing an overly large housing development with disregard to the negative impact a project of this size will have on traffic, the environment, schools, and daily life in South County. NR-1

As a mother raising my family in Nipomo, I am acutely aware that the social services in Nipomo are spread woefully thin (health care, schools, parks, police, etc.). To introduce an additional 5000+ residents in a relatively small area, would be devastating for Nipomo. Nipomo High School is already overcrowded at 146% of capacity. Additionally, Lange Elementary, Dana, and Nipomo Elementary are all overcrowded. Nipomo has ONE park to service all its residents. The proposed Dana Reserve Project doesn't do anything to address the lack of infrastructure in Nipomo and doesn't add anything to the community while placing an unreasonable burden on the community by providing more residents than there are services available for. NR-2

The proposed park site in the middle of the development has been noted by the County Parks as being "to small and encumbered with drainage features that should not count towards acres used of park land" in their comments on the DEIR. Additionally, the developer has requested to waive Quimby fees, which means all maintenance funds will need to be drawn from an HOA, further impacting the affordability of the development. The fact that the developer has requested to waive Quimby fees when they stand to make well over one billion dollars is just further evidence of the greed of the developers and the fact that they are not interested in acting in the best interests of the community. NR-3

It is also questionable how "affordable" these homes might be. It is currently stated that the homes will start in the $600k range, but we all know that with inflation and rising construction costs that a few homes might sell for $699k, but most of them will sell for significantly more by the time they are built. The developers #1 interest is in their investors and in maximizing profits. They aren't in this because they are altruistic citizens of the community wanting to help families buy affordable homes. The reality is that in order to be "affordable," many of these houses will house multiple families, further adding to the overcrowding and traffic in all of Nipomo. NR-4

Additionally, the developer is clearly not interested in the long term affordability of the neighborhood as evidenced by his request to waive Quimby fees and pass those expenses onto members of the community. Like taxes and death it is a fact that HOA fees increase over time and increasing fees further threaten the "affordable" benefits of this project. NR-5

In a time of unprecedented drought, it is unconscionable to allow a developer to build 1300 homes without a solid water recycling line plan to supplement water resources. It is our obligation to include all water saving measures at our disposal when building in a drought stricken area, not just leave it to chance that the developer will do it when the situation is past desperate. A water recycling plan for the community and recycled water line should be included in the project. NR-6

Additionally, there are SIX class I impacts to biological resources identified in the draft EIR. All of them are concerning, but it is especially galling that the developer is trying to greenwash this project by saying he is preserving a few oaks in the middle of the project and buying a hilltop parcel (dana ridge) with oak trees. The Dana Ridge is not an appropriate mitigation site for loss of oaks and Oak Woodlands. Furthermore, allowing Burton Mesa chaparral mitigation outside SLO county, or even off the Nipomo Mesa, is inadequate considering these habitats are not adjacent to the project site. NR-7

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By allowing the developer to get away with clearcutting 3,948 oaks we are setting the precedent for future developers to clear large swaths of trees in prime habitat for oaks and other sensitive species, in favor of undesirable locations on the fridges of where oaks can survive, leading to a total net loss of oak trees in the county. This undermines the existing Oak Tree Ordinance for all future developments to come into the county and causes the loss of this sensitive and very important asset within our community. NR-8

As it stands, the current proposal is overly dense with homes and is not in accordance with the South County Area Plan. It was clear in the EIR that the development priorities for this project site were: NR-9

1. Open space uses
2. Industrial park retail uses
3. Commercial retail use and residential areas

The prioritization of these land uses clearly show that the preservation of on-site oak woodlands and development of commercial and industrial uses were intended to be the primary focus of future development for this site. Additionally, the proposed model wants to incorporate commercial sites within mixed use space has proven not to work in this area. I'm not the only person who remembers that the Trilogy developers promised a market, a hotel, a sheriff station, and other amenities that never came to fruition. Why would this be any different? The long term plan for this site was not to cram in as many homes as possible. Furthermore, the project creates a zoning conflict and sets up the potential for a ton of neighborly disputes by changing the zoning from Rural Residential to Single Family (SF) or Multi Family Residential zoning (MFR). Many, if not most, of the properties surrounding this site have chickens, horses, cows, peacocks, donkeys, goats, etc. To have all of these homes with different zoning packed into such a tight space is a recipe for neighborly disputes and disagreements. NR-10

The reality is that the negative impacts from this project could make Nipomo unlivable and could be a blight on our entire county. If each household has two vehicles, that is a minimum of an extra 2600 cars flowing with only 2 freeway exits available, Willow and Tefft. Traffic in this area already gets backed up at commuting times and during school drop offs and adding an additional 2600 cars would result in a gridlock of traffic on surface streets, as well as the 101. I live off Willow, neighboring the proposed site, and can testify that the traffic studies were done during the first weeks of Covid shut down when there were almost no cars on the road. Currently, when I turn right onto Willow from Hetrick it takes me up to 5 minutes because the flow of traffic is so heavy and steady. I don't even need to get into the congestion on Tefft because we all know what a nightmare it is on Sunday's when the swap meet is in session. Imagine that gridlock, but 7 days a week! A few times each day! NR-11

While we all agree that the county needs to add additional housing, especially affordable housing, allowing a mega development with 1300 homes shoved into one spot by the freeway in Nipomo is not the responsible, environmentally friendly choice and certainly not what is best for this town and SLO county. I hope you will listen to the citizens who live in this area and love their community and want what is best for everyone. I have yet to meet a neighbor or Nipomo resident who is happy about the Dana Reserve Project as it currently stands, or who thinks it will bring any benefit at all to the community. The reality is that we should be honoring the South County Area Plan and trying to preserve as much of the oaks and woodland as possible, add desperately needed commercial amenities to Nipomo, and add a modest number of sustainable and affordable homes to increase housing stock in the county. NR-12

Thank you for your time,

Natalie Rozier

Nipomo Resident

2

9.5.101.1 Response to Letter from Natalie Rozier

Comment No.	Response
NR-1	This comment states this commenter's opposition to the proposed project based on impacts related to traffic, the environment, schools, and daily life. Impacts to the environment are evaluated in accordance with CEQA Guidelines in Chapter 4, *Environmental Impact Analysis*, of the EIR. As such, no changes to the environmental document are necessary. In addition, refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; BR-6, which responds to comments regarding public schools; and CE-3, which addresses comments related to social and economic impacts.
NR-2	This comment raises concern regarding an increase in demand on public services and recreational facilities in the community. Refer to MR-2 and KE-3, which responds to comments related to public services and KK-10, which addresses comments related to recreational facilities.
NR-3	This comment raises concern regarding the request to waive fees for recreational facilities. Refer to KK-10, which addresses comments related to recreational facilities.
NR-4	This comment raises concern regarding affordable housing. Refer to KK-11, which addresses this comment.
NR-5	This comment raises concern regarding affordable housing. Refer to KK-11, which addresses this comment.
NR-6	This comment raises concern regarding the availability of water supply for the proposed project during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
NR-7	This comment raises concern regarding the success of mitigation included in the EIR for Pismo Clarkia and asserts that allowing mitigation for Burton Mesa chaparral outside of San Luis Obispo County would be inadequate. Refer to MR-3 and KK-19, which addresses comments related to Pismo clarkia and Burton Mesa chapparal. This comment also raises concern regarding the loss of oak trees at the project site and the adequacy of proposed mitigation for the loss of oak trees. Refer to MR-3 and JK-4 which responds to comments related to the loss of oak trees and associated mitigation.
NR-8	This comment raises concern regarding the loss of oak trees at the project site, the adequacy of proposed mitigation for the loss of oak trees, and the project's inconsistency with the Oak Woodland Ordinance. Refer to JK-4 which responds to comments related to the loss of oak trees and associated mitigation and ES-3, which addresses comments related to applicable planning policies.
NR-9	This comment raises concern regarding the project's inconsistency with applicable planning documents and inconsistency with surrounding rural residential land uses. Refer to ES-3, which addresses comments related to applicable planning policies; AG-3 and AG-4, which addresses comments related to project alternatives, including development according the La Cañada Ranch; and PH-1, which addresses comments related to consistency with surround rural residential development.
NR-10	This comment raises concern regarding the project's inconsistency with surrounding rural residential land uses. Refer to PH-1, which addresses comments related to consistency with surrounding rural residential development and JEl-6, which addresses comments related to SFR and MFR development near livestock.
NR-11	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
NR-12	This comment recognizes the needs for affordable housing in the county; however, it asserts that the density and location of the proposed project is not ideal. Additionally, this comment asserts that development at this site should be consistent with the South County Area Plan and rural nature of the area. Refer to BR-2, which addresses comments related to population and housing growth; ES-3, which addresses comments related to applicable planning policies; and PH-1, PH-1, which addresses comments related to consistency with surrounding rural residential development.

9.5.102 Maria Sanchez

Jennifer Guetschow

From: Maria Sanchez <m_sanchez_805_ca@outlook.com>
Sent: Sunday, July 31, 2022 10:03 PM
To: Jennifer Guetschow
Subject: [EXT]DR - Water study

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Do I understand correctly that the same contractors who performed a study for the Dana Reserve developer referenced in Appendix I of the EIR also performed an "independent" study for NCSD? This seems inappropriate. **MS-1**

Will Proposition 218 be used for existing NCSD customers to approve the $19mil costs estimated for the thousand homes? **MS-2**

Did the Appendix I expected water usage estimates reflect current rates of water usage by NCSD customers? **MS-3**

Is there a long-term contract in place with the City of Santa Maria past 2026 that will provide a long-term water to NCSD? **MS-4**

I am not convinced the current Dana Reserve project has thoroughly worked through these issues, at least not at the scale proposed. I oppose this project based on the EIR. **MS-5**

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9.5.102.1 Response to Letter from Maria Sanchez

Comment No.	Response
MS-1	This comment raises concern regarding the potential conflict of interest having MKN and Associates (MKN) author both the subject EIR and the NCSD planning report. Refer to GRe-11, which addresses this comment.
MS-2	This comment requests clarity regarding the use of Proposition 218 to approve NCSD water and wastewater costs. Refer to JK-3, which addresses this comment.
MS-3	This comment requests clarity regarding water usage rates used in the WSA prepared for the proposed project. As stated in the WSA, 2020 NCSD customer water usage rates were used in the analysis of the WSA, which reflects the most recent data available at the time of preparation of the WSA and EIR. Therefore, no changes in the environmental document are necessary.
MS-4	This comment questions whether a long-term contract in place with the City of Santa Maria past 2026 will provide long-term water to NCSD. Refer to MR-1, which responds to comments related to water supply.
MS-5	This comment identifies this commenter's opposition to the proposed project based on water supply issues. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply for the proposed project in addition to the existing NCSD service area.

9.5.103 Debra Sauerbier

Debra Sauerbier
670 Del Sol St.
Arg.
mailed 8.1.22
rcvd 8.3.22

SLO Planning Commission
c/oJennifer Guetschow; jguetschow@co.slo.ca.us

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is (circle item/highlight or write in your greatest concern): **DS-1**

Oak Trees support many animal+bird species!

- Housing (imbalanced housing vs job creation, which also increases traffic)
- Transportation (increase traffic, impacts on many roads throughout Nipomo)
- Air Quality
- Greenhouse Gas Emission
- Land Planning (multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project)
- Biological impacts (3,948 oak trees to be removed, federally endangered species to be removed, special habitats to be removed)

DS-2

- Write in other issues of concern (i.e Water, public services) not determined to be a class 1 issue in the EIR

We have no Water! Every element of construction from excavation to landscape planting requires water~ Before any residents even move into the Homes! **DS-3**

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. **DS-4**

we don't believe their promises

DATE: 7-31-22 SIGNED: Debra Sauerbier
email: Surfblue@Charter.net

*copy this letter into your word processing program
Highlight or circle your concern from list.
Date/Sign/add email.
Copy and paste into your email program.
send to jguetschow@co.slo.ca.us
OR
mail to: Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408 MUST BE RECEIVED BY AUGUST 1

9.5.103.1 Response to Letter from Debra Sauerbier

Comment No.	Response
DS-1	This comment raises concern regarding the project's Class I impacts and the loss of oak trees and wildlife habitat at the project site. Refer to DT-2, which responds to comments related to the project's Class I impacts; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
DS-2	This comment raises concerns related to the density of proposed housing and the project's impacts on the jobs-to-housing balance, transportation, air quality, greenhouse gas emissions, consistency with applicable planning documents, and biological resources. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; ES-3, which addresses comments related to applicable planning policies; BR-1, which addresses comments related to habitat loss and wildlife; and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
DS-3	This comment raises concerns related to the availability of water during construction and operation of the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DS-4	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.104 Brian Sawyer

Jennifer Guetschow

From: Brian Sawyer <sawyer.brian@gmail.com>
Sent: Sunday, July 31, 2022 7:12 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Comments - Sawyer

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission

ATTN: Dana Reserve / Jennifer Guetschow; jguetschow@co.slo.ca.us

976 Osos Street, Room 300

San Luis Obispo, CA 93408

Ms. Guetschow,

I am writing you as a longtime Nipomo resident where I am also raising my young family. I have many concerns over the proposed Dana Reserve Project. I recognize the immediate need to housing in the SLO area but placing one massive project like this in Nipomo will drain the areas limited resources without providing any of the benefits stated by the project. Cramming 1300 homes into an already highly taxed small town seems like very poor planning and should not even have made it to this stage. Nipomo already suffers from heavy traffic, poor air quality, crowded schools, and limited park and recreational areas. **BSa-1**

Traffic on Tefft is already notoriously heavy and will shortly be getting much worse with the addition of the large new strip mall on the S Frontage Rd containing many big box store. Willow traffic is also very heavy as it services BOTH the Blacklake and Monarch Dunes developments as well as all of the agricultural traffic headed to Guadalupe. As a resident living with my property directly touching 900 feet of Willow right off 101 I can tell you that there are many times during morning or evening rush hours that it is not possible to turn onto Willow due to this traffic. An additional 1300 homes with multiple cars per unit will choke Willow back onto highway 101 which is already beginning to clog during evening rush hours. This will make South County essentially gridlocked during evening rush hours. The plan ignores many of these issues by insisting that the installation of a traffic light at the 101/Willow intersection will solve all these problems but that is not the case. More modern traffic studies are needed for this development since the most recent ones used appear to be several years old. **BSa-2**

Air Quality on the Nipomo Mesa has always been a top concern and the Air Pollution Control District is constantly issuing alerts due to dust and silica blown over the Mesa from the Dunes. Vegetation and especially trees are one of the few things that mitigates this dust on the Mesa the removal of almost 4000 mature oak trees is unacceptable as well as incompatible with San Luis Obispo's south county area plan. Allowing the removal of mature trees to be replaced by **BSa-3**

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non-developable areas that are very distant from the community sets a terrible precedent that will allow future developers to essentially clear huge amounts of mature trees and cause extensive vegetative loss in the local community. The current development plan is nothing short of a maximum housing cash grab with no environmental stewardship whatsoever. BSa-3 (cont'd) BSa-4

Nipomo area schools are currently barely able to cope with the current population much less the addition of 1300 families. Nipomo High School is at 140%+ capacity with other schools in the area being very close to full capacity. There is no discussion in the EIR of the developer's plan to fund or provide for the requisite additional schooling facilities which would typically be included in a project of this scope. BSa-5

Finally this is NOT, as stated in the project plan, a development with "multiple open green spaces" and public parks. There is ONE park in the middle of the development that even the County Parks called "too small and encumbered with drainage features that should not count toward acres used for park land". The other green spaces are simply access areas and curbsides. Compared to the pocket parks in Monarch Dunes or Blacklake, both much more responsible developments with their own hosts of issues this one is abysmal. Further the developer request to waive the Quimby fees by donating this land as a park is a joke. This park, that the County says shouldn't even be considered a park was required for project drainage. The developer should still be required to pay Quimby fees in any case to pay for his own "park" as well as the much heavier use of the actual local parks in Nipomo. BSa-6

There are many more issues that I'm certain you are being inundated with so I will stop there. But overall I think it is shameful that San Luis Obispo County would even humor this current plan and EIR which is rife with Class I impacts. This would be the largest development this area has ever seen at a time when traffic, air pollution, school crowding, and public services in Nipomo are at their worst levels ever. Affordable housing is certainly needed in SLO county but it is needed evenly around the entire county, not packed into one high-density area so that one developer can make a billion dollars on the backs of the Nipomo citizenry. The massive negative impacts to Nipomo will not overcome any social or economic benefit seen by such an irresponsible plan. BSa-7 BSa-8

Brian & Natalie Sawyer

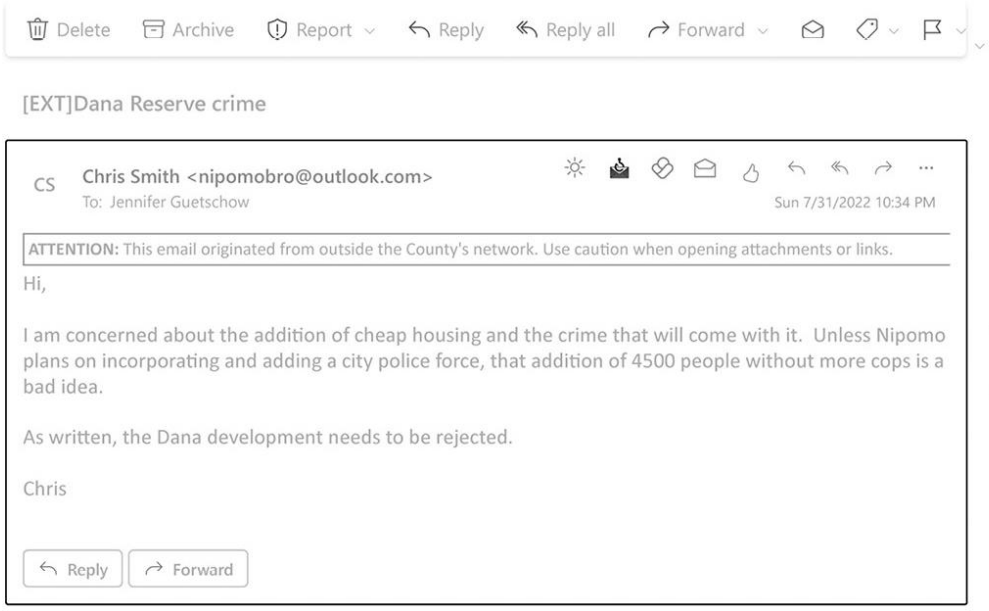
622 Cherokee Pl

Nipomo, CA 93444

9.5.104.1 Response to Letter from Brian Sawyer

Comment No.	Response
BSa-1	This comment raises concern regarding limited resources, traffic, air quality, capacity of public schools, and limited parks and recreational facilities. Refer to DR-3, which responds to comments related to community services; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; BR-6, which responds to comments regarding capacity of public schools; and KK-10, which addresses comments related to recreational facilities.
BSa-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
BSa-3	This comment identifies air quality issues within the community and raises concern regarding an increase in air emissions and dust as a result of tree removal. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions. In addition, refer to DMW-3, which addresses comments related to dust.
BSa-4	This comment asserts that the proposed development is focused on economic profit and dismissed environmental stewardship. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
BSa-5	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.
BSa-6	This comment raises concern regarding parks and recreational facilities and the request to waive associated fees. Refer to KK-10, which addresses comments related to recreational facilities.
BSa-7	This comment raises concern regarding the density of the proposed project and associated impacts on traffic, air pollution, schools, and public services. Refer to BR-2, which addresses comments related to population and housing growth; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; BR-6, which responds to comments regarding public schools; and MR-2 and KE-3, which responds to comments related to public services.
BSa-8	This comment asserts the need for affordable housing in the county but raises concern regarding the density and location of the proposed project and the project's social and economic impacts. Refer to BR-2, which addresses comments related to population and housing growth; SSh(1)-5, which responds to comments regarding an alternative location for this project; and KK-11, which addresses comments related to affordable housing.

9.5.105 Chris Smith



CSm-1

9.5.105.1 Response to Letter from Chris Smith

Comment No.	Response
CSm-1	This comment raises concern over an increase in crime and lack of police protection facilities. Refer to MR-2 and KE-3, which responds to comments related to public services, including police protection facilities.

9.5.106 Tom Smith

Jennifer Guetschow

From: Tom Smith <tscp2000b@yahoo.com>
Sent: Sunday, July 31, 2022 1:24 AM
To: Jennifer Guetschow
Subject: [EXT]Proposed Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Thanks in advance for listening to this feedback on the Dana Reserve. Our air quality in the Nipomo Mesa is already bad enough with local pollution from both the traffic and the dunes. Why make it worse with adding thousands of new homes and all the construction activities!?

TS-1

1

9.5.106.1 Response to Letter from Tom Smith

Comment No.	Response
TS-1	This comment raises concern regarding air quality. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions. In addition, refer to DMW-3, which addresses comments related to dust.

9.5.107 Dan Stocks

Jennifer Guetschow

From: danstocks <danstocks@charter.net>
Sent: Sunday, July 31, 2022 10:05 PM
To: Jennifer Guetschow
Cc: District 4
Subject: [EXT]Dana Reserve Concerns

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

In my opinion there are several issues with the proposed Dana Reserve. The present infrastructure in Nipomo cannot support such large growth. Already in the mornings and weekend afternoons Teftt Street is at a standstill from Mary to the 101 Interchange. A few years ago, it was deemed the most congested intersection in the county. Some re-aligning and improvements have been done since then but it is still far from being noncongested. The North Frontage Road needs to be four lanes throughout to handle the present traffic plus the additional traffic this project will create. With the Frontage Road ending at Juniper all the traffic is going to have to turn on Juniper. Which is another road that cannot handle additional traffic. Some will turn again on Mary and some will continue down Juniper to Pomerory. To handle the additional traffic Juniper should be widened to four lanes, at least until Mary. Mary should be widened to four lanes with turn lanes between Juniper to Teftt. Even with the roads widened to four lanes, there still is going to be congestion because of all the intersections. The developer in his statements says he wants to ease traffic congestion by continuing the frontage road all the way to Willow. Continuing the frontage road to Willow will be nice for his development but the development will definitely compound an already congested Teftt as well as increase the traffic on the residential streets adjacent to his project. It seems a more viable option for the county, and one that would decrease the traffic on Teftt, would be to add a new freeway interchange halfway between Willow and Teftt. Also, with the expanded roadways there needs to be sidewalks and bike lanes added on all these roads. On the north side of the project is Cherokee Place. Presently it is a dead-end dirt road. This road is going to connect the North Frontage Road to Hetrick. It sounds like this road is going to be paved and is not meant to carry traffic. It will. It is going to one of the main roadways to enter/exit the project from the northwest. The plan for this road is to just pave it. It needs to be a full two lanes with sidewalks and a bike lane.

DaSt-1
DaSt-2
DaSt-3
DaSt-4
DaSt-5

The developer is touting how recreation fits into his development plan. There needs to be recreation access from the surrounding areas for the residents in the development as well as the residents living next to the development. Presently my wife and I walk down Cherokee Place because there is not any traffic on it. We want to be able to continue to safely walk on it. Without a sidewalk this will be dangerous. We want to be able to walk to all the new amenamenities this devedevelopment will provide All the above road improvements should be in place prior to the start of the project. It is not the existing resident's fault that a large development is proposed. Therefore, they should not be penalized for its implementation. Road infrastructure needs to be in place before the project begins.

DaSt-6
DaSt-7
DaSt-8

Looking at the plan there does not appear to be enough on street parking for the number of houses being built. The high-density housing is just orange blobs on the plan that do not show how the housing is going to be placed nor the parking. The cluster housing shows the houses and the cluster roads which seem to be like the PUDs in the Five Cities. There is not enough parking for these residents. With the average family having 2 cars per household, I would propose that every residence should have a minimum of one additional parking space on the street besides what they can fit in their garages. Even the houses on the smaller lots need more on street parking. If you go and drive through the neighborhood of the development across the street from Jocko's down Thompson towards the high school, you will see how that area was developed without enough parking. I have a friend that lives in that neighborhood that must park on Thompson sometimes because there is not enough on street parking. Let's not repeat that problem.

DaSt-9

1

Nipomo High School at capacity. Where are the high school students in this development going to go to school? Nipomo? When the school at capacity, adding that many new students will have a negative impact on the students/staff already there. The EIR states that the high school is 0.2 miles from the development. Which it is true if you could fly there. Unfortunately, direct access is blocked by a freeway, so they are going to either go to Tefft adding to the congestion or go to Willow. Again, there are no sidewalks along these busy roads so walking along them is not safe. It is too far for students to realistically walk. Same with elementary age school children. Where are they going to be going to school? There is room at Lange Elementary for 85 more students. What if there are (probably there will be) more than 85 elementary age children in this development? With schools running at or near capacity, there needs to be solutions in place before construction starts. **DaSt-10**

There is a park in the middle of the development. The developer wants the Quimby fees waived and does not want to maintain the park. The County Parks doesn't want to maintain it either. The other "Pocket Parks" and facilities will be maintained with homeowner association fees. How affordable is affordable housing when there are HOA fees in addition to mortgages? If the county does not maintain the park, then how much more will the HOA fees increase? Or will they say it is too expensive to have a park and just get rid of it? Since when are drainage basins considered parks? **DaSt-11**

In the EIR there is a section about water. There is going to be much water infrastructure improvement needed for this project to happen. Hopefully, the developer will need to bare the burden of this cost. It would not be fair to existing residents to pay for the water infrastructure for this project. The other large developments in Nipomo (Trilogy, Black Lake, Cypress Ridge) have had to install water recycling for their projects. This development's plan is to put in pipes to the edge of their property and say, oh well it's not our responsibility to go any farther. That is not a plan. The developer needs to develop a plan that uses the water on site at the pocket parks, park and other common areas or develop a plan that returns it to NCSD. **DaSt-12**

How can a development of this size be approved in the such a severe drought? Our own governor stood at Lopez Lake urging all Californians to cut water usage by 35%. Yet in Nipomo there seems to be a water surplus even though the NCSD has sent several letters to its customers urging them to conserve water. Depending on a city in a different county for water from its aquifer is not responsible. Even though it is contracted to be sent to Nipomo, if water in Santa Maria gets scarce you can bet they are going to serve their residents first and say sorry Nipomo. Has there been a comprehensive study done on Santa Maria's aquifer and how much is there? What are Santa Barbara County's development plans? Tying yourself to a different county makes you subject to their needs. Bad planning. Just the water needed for this project, should be enough to sideline it until other water sources are developed in SLO County. **DaSt-13**

There is an oak woodland ordinance in SLO County that was initiated because of the Justin Vineyard clearcutting of oak woodlands. This is the same type proposal. This is exactly why the ordinance was enacted. Please do not allow the removal of 3943 of the 5128 Coast Live Oaks on this property. The developer saying that preserving a piece of property not near the development, not accessible by the public, that is already too steep to develop is of equal importance. I say it is not. It already cannot be developed so preserving it from development is moot point. Burton Mesa Chaparral in San Luis Obispo County already not common. Destroying 36 acres of this limited resource does not make sense. If the developer wants to develop this parcel the they should mitigate it with preserving an adjacent piece of property on the mesa that contains 3943 oak trees and 36 acres of Burton Mesa Chaparral. **DaSt-14**

I have lived in the South County for over forty years and have seen the development. I have raised five children here and love this area. The social and economic benefits of this project do not even come close to the impacts. Thank you for giving me the opportunity to voice my concerns about the Dana Reserve. I would appreciate any feedback. **DaSt-15**

Sincerely,

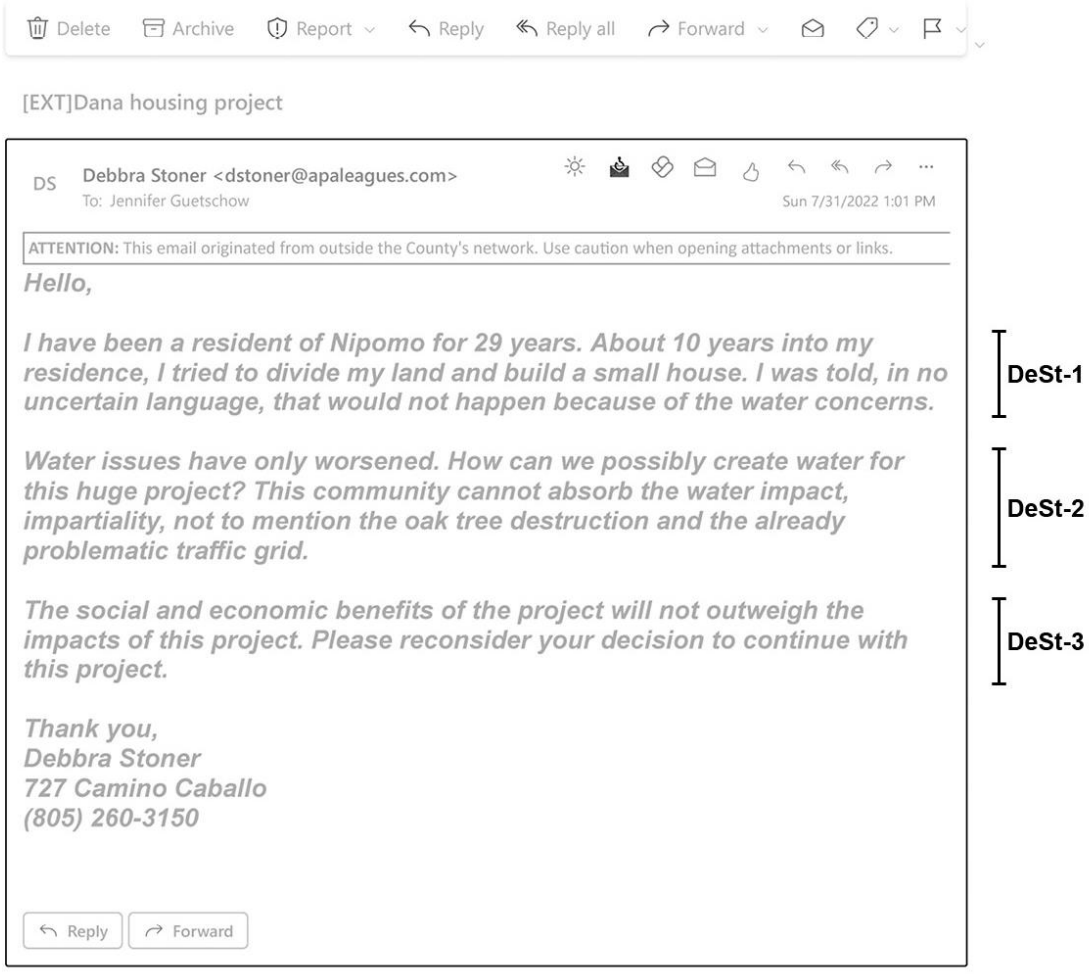
Dan Stocks

2

9.5.107.1 Response to Letter from Dan Stocks

Comment No.	Response
DaSt-1	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
DaSt-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
DaSt-3	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
DaSt-4	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
DaSt-5	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
DaSt-6	This comment asserts that the community should be provided access to proposed recreational facilities. As evaluated in Chapter 2, *Project Description*, of the EIR, the proposed project includes the construction of pedestrian, bicycle, and equestrian trails to connect the proposed project to the existing community. As this issue was evaluated in the EIR, no changes to the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
DaSt-7	This comment asserts that the community should be provided access to proposed recreational facilities. Refer to KK-10, DaSt-6, and JK-7, which addresses this comment.
DaSt-8	This comment asserts that transportation infrastructure should be installed prior to development to allow accessibility to the project area. Refer to JK-7, which addresses this comment.
DaSt-9	This comment raises concern regarding parking. As evaluated in Section 4.17, *Transportation*, the project would be consistent with travel demand management strategies, which calls for a reduction in parking. The Specific Plan Area is located adjacent to the URL in an area planned for growth within the NCSD's sphere of influence, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park. As this issue was evaluated in the EIR, no changes to the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
DaSt-10	This comment raises concern regarding the capacity of the LMUSD. Refer to BR-6, which responds to comments regarding public schools.
DaSt-11	This comment raises concern regarding parks and recreational facilities and the request to waive associated fees. Refer to KK-10, which addresses comments related to recreational facilities.
DaSt-12	This comment raises concern regarding the cost of NCSD water improvements. Refer to JK-3, which addresses this comment.
DaSt-13	This comment raises concern regarding the availability of water supply for the proposed project during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DaSt-14	This comment raises concern regarding the loss of oak trees at the project site, inconsistency with the County's Oak Woodland Ordinance, and adequacy of mitigation for biological resources. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees, associated mitigation, and alteration of the visual character of the project site and ES-3, which addresses comments related to applicable planning policies.
DaSt-15	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.108 Debbra Stoner



9.5.108.1 Response to Letter from Debbra Stoner

Comment No.	Response
DeSt-1	This comment states that this commenter was unable to subdivide their land due to concern over the availability of water. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions. This comment does not identify any deficiency with the EIR; therefore, no revisions are necessary.
DeSt-2	This comment raises concern regarding the availability of water to the community in addition to the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
DeSt-3	This comment expresses concerns related to the project's impacts related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.109 Brian Thompson

From: Brian Thompson <calpoly1_1997@outlook.com>
Sent: Sunday, July 31, 2022 11:36 PM
To: Jennifer Guetschow
Subject: [EXT]Dana project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Greetings. Did the EIR consider Diablo Canyon and their emergency response organization members who live in Nipomo? How will the addition of 4500 or more new people north of them impact their potential commute time in the event of an emergency? Shouldn't this be evaluated? BT-1

9.5.109.1 Response to Letter from Brian Thompson

Comment No.	Response
BT-1	This comment raises concern regarding an increase in population and emergency evacuation efforts. Refer to BR-2, which addresses comments related to population growth and HE-1, which addresses comments related to emergency evacuation efforts.

9.5.110 Mary Van Ryn

Jennifer Guetschow

From: Mary Van Ryn <maryvanryn@yahoo.com>
Sent: Sunday, July 31, 2022 9:55 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hi,

I oppose the location of the Dana Reserve project for a variety of reasons. **MVR-1**

1. The destruction of native oak trees and other flora and fauna on the west side. It's irreplaceable.
2. Increased traffic - this has been a problem for years. I raised 3 children here, and spent hours in traffic... it was infuriating. **MVR-2**
3. Concern over water - we need to be smart with the usage of water. **MVR-3**
4. We are already dealing with increased population problems in our neighborhood from the counties lack of code enforcement (it has been a challenge that we are finally getting help with, but we are far from done). We have people renting sections of land to conduct businesses that increase noise pollution and the density of people. I didn't move onto 3 acres to have neighbors renting to multiple people to conduct their businesses. We have many problems here already. **MVR-4**
5. We have old Town Nipomo that would benefit from a new development on the east side. There's plenty of land available that does not require the destruction of thousands of oak trees. It would also revitalize the area.
6. An east side development could include a cultural area that includes a museum and park dedicated to our beginnings.
7. Nick Tompkins, with good intentions, didn't bother finding out what the residents felt about this development.
8. We deserve to live the rural life.
9. We deserve to live the life we moved here for.
10. Nick wants a legacy, then I suggest he honors our town and its future.
11. TURN the Dana Reserve into a county park. That would be the best solution.
12. We should have more community gardens close to areas where there are housing without yards. . **MVR-5**
13. Better transportation for residents to get around town. **MVR-6**

We have alot of problems in Nipomo, but what stands out most to me, is the decades of the Board of Supervisors controlling our town. They've ruined it with golf courses and homes no resident in Nipomo wants to live in or can afford. **MVR-7**

Thank you in advance,

Mary van Ryn

Sent from Yahoo Mail on Android

1

9.5.110.1 Response to Letter from Mary Van Ryn

Comment No.	Response
MVR-1	This comment raises concern regarding the project's impacts on biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
MVR-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
MVR-3	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
MVR-4	This comment raises concern regarding an increase in population associated with the proposed project and concern related to neighborhood compatibility. Refer to BR-2, which addresses comments related to population and housing growth and PH-1, which addresses comments related to neighborhood compatibility.
MVR-5	This comment suggests developing the proposed project in an alternative location to avoid destruction of oak trees at the project site, impacts to neighborhood compatibility, and inconsistency with the rural nature of the project area. Refer to SSh(1)-5, which addresses comments related to an alternative location for the proposed project and PH-1, which addresses comments related to compatibility with the existing community.
MVR-6	This comment expresses concerns related to transportation infrastructure. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements. In addition, refer to EG-4, which addresses comments related to transit and SSh(1)-2, which addresses pedestrian and bicycle facilities.
MVR-7	This comment identifies unwanted development in the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.111 Cynthia Bodger

Jennifer Guetschow

From: cynthia bodger <theabodger@gmail.com>
Sent: Monday, August 1, 2022 10:35 AM
To: Jennifer Guetschow
Subject: [EXT]Dana

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Frim-
To: cynthia bodger
745 Sandydale Drive Nipomo

There is really only one major problem with the proposed Dana Reserve Development. Its slated to be built in the wrong place. Initially that sounds crazy but when one opens up their mind to the potential benefits of building elsewhere, it becomes an incredibly compelling concept. The following considers just a few of the many reasons why that is true. CB-1

Developing the currently proposed site involved destroying the most desirable and unique habitat in Nipomo. Look at the property on Google maps and then zoom out. Canada Ranch should be preserved as it is to be the centerpiece of the town, like a small scale version of New York's Central Park. It is a priceless piece of property that should be protected and reserved for future generations to enjoy. CB-2

From a rational zoning perspective the proposed location is abysmal. It is surrounded on three sides by 1 to 5 acre rural properties. None of the people in those neighborhoods wants to live next to a high density development. CB-3

Moving the development to the other side of the freeway could act as a catalyst to reinvigorate old town Nipomo. CB-4

Moving the development to the other side of the freeway would also have the benefit of a large amount of space for future expansion that might include businesses that would provide jobs. That would help the problematic EIR finding of a substantial increase in the number of vehicle miles traveled commuting to job rich SLO from job poor Nipomo. CB-5

It has been said that the proposed location is wonderful because it is convenient to the High School--which is only about a 1000 feet away. It would be great if teenagers could walk to school or for students at the High School to walk to the Cuesta Satellite Campus. The problem is to do that would require sprinting across the 101 freeway and jumping some fences. Move the development to the other side of the 101 and it solves that along with many other problems. CB-6

1

Speaking of traffic, anyone familiar with this area knows that the traffic situation is already awful. Weekends and peak periods on Tefft can approach gridlock. The proposed development is for 1,289 housing units plus a variety of commercial buildings. However, that does not factor in ADUs. The evolving housing laws sent down from Sacramento now allow any single family residence to be converted into a triplex. There is a push to further modify the law to permit a fourplex on any SFR lot. If the total amount of potential traffic from the Dana Reserve was combined with several other future residential developments in the vicinity, it would create an untenable traffic situation along with a high level of both air and noise pollution.

CB-7

The pollution from the thousands of people living or visiting Dana Reserve is just one of many related negative impacts. Higher population density is associated with increased crime, higher insurance rates, health issues such as miscarriages, along with a plethora of mental disorders. Our goal should be for a kinder, gentler society.

CB-8

Driving into Nipomo on the 101 from the south the town is less than impressive. First you are greeted by the stench of the sewage treatment plant. As the smell dissipates you are then treated to some of the least inspired and most poorly planned architecture to be found in the County. So it is ironic that amount a mile past Tefft the landscape changes to beautiful vistas of trees and open spaces--vistas that would be destroyed by the Dana Development.

CB-9

Directly adjacent to the Northeast corner of the proposed development are some of the most impressive groves of eucalyptus to be found anywhere. They are magnificent and being protected and maintained by the landowners. Next door is even more impressive with thousands of mature oak trees that have thrived there for hundreds of years yet are slated to be ripped up and replaced with tract houses and apartment buildings. Why? Because there is money to be made. Which is fine. We all need money. Yet, it is important that County residents understand how things work.

Large plots of farmland near Nipomo are typically sold for five to ten thousand dollars an acre. If that same land could be subdivided into five acre parcels and zoned for a single family residence its value soars to over one hundred thousand dollars an acre. Single acre vacant residential lots can be worth half million dollars or more. High density developments can be worth a million per acre. (And if the goal is to put as many people as possible into the smallest possible footprint, build skyscrapers and create even more value).

CB-10

Its all about location and zoning. The County Board of Supervisors has the power to rezone land in the County. This goes a long way towards explaining why people make large donations to County Supervisor candidates. It might also help clarify why a person or group would spend over one hundred thousand dollars for a recount of a SLO County Board of Supervisor election.

CB-11

2

It also help people understand why smart elected officials can negotiate with developers to get perks for the County like parkland, a lot to build a police station and or a fire station.

Which leads us to the most important point of politics and land use. The County Board of Supervisors may make the decision as to what to permit or rezone however they are elected officials. The decisions they make are supposed to represent the will of the people they serve. That is a concept that is too often forgotten. Unfortunately sometimes politicians or civil servants also forget and develop condescending attitudes because they think they know more than constituents, when in fact, they just have a different perspective.

CB-11 (cont'd)

This is relevant with regard to Dana Reserve because much of the presentation regarding the Reserve seems to not be considering the perspective of the resident's of Nipomo. They tout the benefits of quicker access to the new Willow interchange as if that is the only way residents of the area will be able to realize a cure to the current convoluted traffic layout. That is not true. Eminent domain would allow the County to solve the problem in an optimal fashion by extending the frontage road from the Swap Meet to Willow. A strong leader could step forward and propose such a solution. The same is true of the new Fire Station which could be placed in an optimal location instead of taking whatever happens to be offered by a developer.

CB-12

CB-13

As for the Dana Ranch, there must be one or more politicians in the County that could suggest or even help negotiate a land swap to move the high density residential project slated to destroy Canada Ranch to a lower density location that's in a place that will not cause such a huge amount of ecosystem damage and at the same time eliminate a traffic/pollution/zoning disaster that Nipomo would regret forever.

CB-14

In Emily Creel's presentation on the EIR she made it clear that there are some insurmountable issues that cannot be mitigated. More alternatives need to be formulated, discussed and more information disseminated. There is plenty of time to do this right. You can't rush a project of this magnitude.

CB-15

There are lots of concerned, inquisitive people in Nipomo that have worked for many years so that they could live in Nipomo. It is a beautiful and special place that deserves to be protected. Working together we can all help that dream to be realized.

CB-16

Please confirm receipt of this email.

jguetschow@ca.slo.ca.us

Version 2

9.5.111.1 Response to Letter from Cynthia Bodger

Comment No.	Response
CB-1	This comment suggests that the main issue with the proposed development is the proposed location. Refer to SSh(1)-5, which addresses comments related to an alternative location for the proposed project.
CB-2	This comment asserts that the project site consists of unique habitat which should be preserved. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CB-3	This comment raises concern regarding the project's compatibility with surrounding rural residential development. Refer to PH-1, which addresses this comment.
CB-4	This comment suggests relocating the proposed development to the other side of the freeway. Refer to SSh(1)-5, which addresses comments related to an alternative location for the proposed project.
CB-5	This comment asserts that moving the proposed project to the other side of the freeway would allow future expansion of commercial uses. Refer to AG-3 and AG-4, which responds to comments related to project alternatives. This comment also raises concern regarding the jobs-to-housing balance in the community. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
CB-6	This comment asserts that moving the proposed project to the other side of the freeway would facilitate easier access to Nipomo High School. Refer to AG-3 and AG-4, which responds to comments related to project alternatives. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CB-7	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
CB-8	This comment raises concern regarding air pollution. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
CB-9	This comment raises concern regarding the alteration of the existing visual character of the project site. As evaluated in Section 1, *Aesthetics*, of the DRSP EIR, implementation of the project would alter the existing visual character of the rural project area and was classified as a Class I impact. As such, concern related to the alteration of the visual character of the project site is consistent with the evaluation included in the DRSP EIR; therefore, no changes in the environmental document are needed.
CB-10	This comment raises concern regarding the loss of oak trees at the project site and economic impacts. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site. Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the impacts would have a negative impact on the physical environment, or if the impacts would result in growth-inducing impacts. As such, no changes in the environmental document are needed.
CB-11	This comment identifies the powers of the County's Board of Supervisors and discusses politics within the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CB-12	This comment discusses politics within the community and asserts that the proposed development would be inconsistent with community needs. Refer to CB-11, which addresses this comment.
CB-13	This comment discusses politics within the community. Refer to CB-11, which addresses this comment.
CB-14	This comment discusses politics within the community. Refer to CB-11, which addresses this comment. This comment also raises concern regarding traffic, pollution, and neighborhood compatibility. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; and PH-1, which addresses comments related to the project's consistency with the surrounding area.
CB-15	This comment reiterates that the project would result in Class I impacts. Refer to DT-2, which addresses this comment.
CB-16	This comment suggests working together to solve issues raised by the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.112 Kevin Buchanan, SLO County YIMBY

Jennifer Guetschow

From: Kevin Buchanan <kevaustinbuch@gmail.com>
Sent: Monday, August 1, 2022 2:11 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve Specific Plan - Draft Environmental Impact Report

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO County YIMBY (Yes in My Backyard) would like to submit the following comments, originally published in The Tribune on July 18th, in regards to the Dana Reserve Specific Plan.

https://www.sanluisobispo.com/opinion/readers-opinion/article263493523.html

Actions have consequences. And, as we're learning, so does inaction. SLO County cities have shown mostly inaction and lack of urgency in proposing and enacting solutions to the growing housing crisis over the last decade.
Sure, it's easier to build an ADU. And with SB9, cities have begrudgingly accepted duplexes (within many restrictions) into some more neighborhoods. But new home production in SLO County cities remains inadequate, which means that old homes become expensive homes. New homes that do get built usually don't serve low or moderate incomes. And there aren't enough of them to reduce demand and prices for old homes, which is one reason subsidized housing is also important. YIMBY-1

But, the wishful thinking of a revised and expanded inclusionary housing ordinance in SLO, (increasing the affordability requirement from 3% to 10%) is more likely to reduce building, and provide fewer funds for subsidized homes, than a more lax policy with more broad based funding would. 10% of few new homes is less than 3% of many more new homes that could be built with fewer disincentives. Consider this, if you will, the "thoughts and prayers" response of our local leaders to a housing crisis. Doubling down on already failed policies that haven't produced enough homes (market rate or subsidized) for decades.

With this inaction, we inevitably get to the consequences. Dana Reserve, a sprawling greenfield project on 288 acres with 4,000 oak trees, would bring 1,289 new homes to the county. These are homes that, ignoring other factors, are certainly needed. But where? SLO County cities and residents have consistently asked for homes to be built anywhere but near them. So this must be the place, I guess? YIMBY-2

In 2020, San Luis Obispo adopted a Climate Action Plan, which "establishes a community-wide goal of carbon neutrality by 2035" and "also focuses on using resources more effectively." The city's website clarifies that "The City is committed to the 'action' part of 'climate action.'". Nowhere in this "action" plan does it account for the destruction of trees (a carbon sink), increased tailpipe emissions from more commutes to and from Nipomo, and the inefficient use of water and other resources in building more sprawl into our coast's open spaces rather than in cities like SLO. Housing policy is climate policy. Real climate action necessitates more homes closer to where people need to be. YIMBY-3

Arroyo Grande - Nipomo's nearest SLO County neighbor and South County's largest job center - has abysmally failed to meet its housing production goals for the last decade. Again, a predictable outcome when affordable designs like duplexes, triplexes, and smaller apartment buildings are illegal or onerous to build in the majority of the city. AG's mayor recently claimed that she'd like to build more homes so that her own kids don't need to move out of state, but asserted that she needs to balance that interest with the concerns of "people who have made investments here." For a city - like many in our county, with crumbling roads, insufficient budgets, and declining school enrollment - forcing new homes, workers, students, and taxpayers elsewhere doesn't seem like it has worked out to be a good investment strategy. YIMBY-4

One of the most common concerns raised about Dana Reserve, or really any development in our county, is that of YIMBY-5

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traffic. "Traffic is already impacted!" "Where will the cars park?" "We're turning into LA!" Predictable concerns of a region who - just like Los Angeles - has chosen to push all new development to the fringes, with car-dependent transportation planning, doomed to fail at both transportation and housing. Local leaders claim we don't have the density for transit, while at the same time they prevent that moderate density because we need space for the cars that people drive due to the lack of adequate transit or bike infrastructure.

YIMBY-5 (cont'd)

If we don't want to become a sprawling, traffic burdened place, the best way to do that is not to shut down any and all development of new homes, but to embrace incremental development in our existing cities. NIMBYism led to predictable consequences in the problems we now face with housing, traffic, and infrastructure. NIMBY says, "Don't build here, build somewhere else" and naively thinks the problem is solved. YIMBY says, "Don't build somewhere else, build here" and works to build cities that meet people's needs.

SLO County YIMBY believes abundant housing can and should be built where it's needed - near jobs, schools, and services. In different shapes and sizes to meet the needs of current residents and future residents as they age, start new jobs, or build families. Where productive places can build wealth by building homes for our kids who want to stay here, and parents who want to see their kids and grandkids grow up. More homes within our cities is good policy - for the climate, for our children, for transportation, and for our infrastructure. Building in cities like Arroyo Grande, Grover Beach, Pismo Beach, San Luis Obispo, Atascadero, and Paso Robles means we truly can use our resources more efficiently and effectively to provide homes while improving quality of life for all.

YIMBY-6

Kevin Buchanan
Lead Organizer, SLO County YIMBY
https://www.slocoyimby.org/

2

9.5.112.1 Response to Letter from Kevin Buchanan, SLO County YIMBY

Comment No.	Response
YIMBY-1	This comment identifies the history of the housing crisis in the county and expresses concern related to the County's response to the housing crisis. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
YIMBY-2	This comment asserts that the County's inaction regarding the housing crisis has led to the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
YIMBY-3	This comment asserts that the project would be inconsistent with the City of San Luis Obispo's Climate Action Plan. The project is not within the City's jurisdiction; therefore, these policies are not applicable to the proposed project. As such, the comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. This comment also raises concern regarding the density of the proposed development, which would lead to an inefficient use of water and other resources. Refer to DR-3, which addresses this comment. Additionally, the comment asserts that the proposed project would further impact the community's jobs-to-housing balance. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
YIMBY-4	This comment identifies the City of Arroyo Grande's inability to meet housing production. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
YIMBY-5	This comment raises concern regarding an increase in traffic congestion and lack of transit and bicycle infrastructure. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; EG-4, which addresses comments related to transit; and SSh(1)-2, which addresses pedestrian and bicycle facilities.
YIMBY-6	This comment encourages building new homes in locations near schools, jobs, and other services. Refer to SSh(1)-5, which addresses comments to development of the proposed project at an alternative location.

9.5.113 Cheryl Carlsen

Jennifer Guetschow

From: Cheryl Carlsen <cheryl92708@yahoo.com>
Sent: Monday, August 1, 2022 11:59 PM
To: Jennifer Guetschow
Subject: [EXT]PROPOSED DANA RESERVE PROJECT

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello, Jennifer,

I am sending this email to oppose the proposed Dana Reserve Project in its current form.

I am an owner with my husband, living adjacent to the property, where Hetrick and Glenhaven meet to form a hairpin turn. CC-1

The DEIR issues that concern me most are:

1) Removal of almost 4,000 oak trees and rare and endangered plants and native habitats. This is going to totally change the character of Nipomo, replacing the trees with high-density housing backed up to existing rural lots. I am also concerned about the effect on air quality. The trees have provided a wind-break, and with their removal, the increased dust in the air is going to be detrimental to health quality, especially us seniors with pre-existing conditions. CC-2

2) the increased traffic created by the addition of so many units. We already have traffic issues in our neighborhood with impatient drivers taking the shortcut from Pomeroy to Ten Oaks to Glenhaven to Hetrick at high speeds. It's hardly safe to walk around that corner now and with more cars, there will be more danger. I'm also concerned about the increased traffic that will be created on Willow. CC-3

I hope that you will take these concerns into consideration before approving the Project as it is today. Maybe fewer homes should be considered. Thank you. CC-4

Cheryl Carlsen
714 Glenhaven Place

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9.5.113.1 Response to Letter from Cheryl Carlsen

Comment No.	Response
CC-1	This comment identifies this commenter's background as it relates to the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
CC-2	This comment raises concern regarding the loss of trees at the project site and associated air quality impacts. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; and DMW-3, which addresses comments related to dust.
CC-3	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
CC-4	This comment suggests the development of fewer residential uses. Refer to AG-3 and AG-4, which responds to comments regarding project alternatives.

9.5.114 Kenneth Dalebout

Jennifer Guetschow

From: Kenneth Dalebout CA-Arroyo Grande <kenneth.dalebout@commonspirit.org>
Sent: Monday, August 1, 2022 2:28 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve - Draft Environmental Impact Report

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer Guetschow

I write in support of the further development of the Dana Reserve project. The need for housing in San Luis Obispo County is undeniable. Additional housing addresses several issues that are present on the Central Coast and in San Luis Obispo County. While this is a wonderful place to live, many that live here struggle to advance their standard of living. The fact that the cost of housing is high compared to wages has been published for several years. One part of the housing cost solution is the development of more housing. And, more housing is needed that will allow local residents to upgrade from renters to homeowners, and from starter to dream homes. The Dana Reserve specifically and compassionately addresses this need through emphasis on home pricing and preference for local residents.

Similarly, many of our local businesses struggle to recruit new talent to the area. These businesses include healthcare, specialized manufacturing, agriculture and small businesses. An element of that struggle to retain talent is the cost of living and a significant component of the cost of living is housing. A greater supply of workforce housing will allow the retention and recruitment of talented contributing residents in the County. In healthcare, we experience the same issue. We struggle to retain a workforce that, while they enjoy the Central Coast, they can work elsewhere at the same wage, for a much lower cost of living and the promise of homeownership. There are shortages of certain types of critical workers in the hospitals and other care settings. So while housing shortages create business difficulties, it also can have a direct impact on the health of the community. Abundant, quality housing is essential to a healthy community.

The covenants in the Dana Reserve plan directly improve the long-term health of the community as related to housing through the increase in the number of affordable workplace housing units, and also the planned preference for local residents.

KD-1

Another benefit is to the Nipomo community. The Dana Reserve adds needed infrastructure in terms of traffic flow that is caused by a lack of circulation options for the Tefft corridor. While housing may add more cars, the proposed infrastructure improvements will undoubtedly be sufficient to address the demands of the additional housing, but also the current stagnant traffic issues that have no current solution. The Dana Reserve will assist with easing traffic jams and limited traffic ways, which will undoubtedly be an improvement for public safety. The additional parks, accessible open space, and pleasing aesthetics are positives for a healthier community.

While all developments have some potentially negative impact on the current community, the benefits of additional affordable housing, access to public open space, improved infrastructure and economic stimulus are clear benefits that will be generated by the Dana Reserve for Nipomo and San Luis Obispo County.

KD-2

Ken Dalebout

Administrator

Arroyo Grande Community Hospital

805-473-7600

Kenneth.Dalebout@dignityhealth.org

Caution: This email is both proprietary and confidential, and not intended for transmission to (or receipt by) any unauthorized person(s). If you believe that you have received this email in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.

9.5.114.1 Response to Letter from Kenneth Dalebout

Comment No.	Response
KD-1	This comment expresses support of the proposed project based on the creation of new homes, which could facilitate additional employees to the area. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
KD-2	This comment expresses support of the proposed project based on improvements to the transportation system, additional parks, open space, and pleasing aesthetics. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.115 Ruth Danielson

Jennifer Guetschow

From: Ruth Danielson <rdanielson@msmarketintel.com>
Sent: Monday, August 1, 2022 3:42 PM
To: Jennifer Guetschow
Subject: [EXT]Comment on the Proposed Dana Reserve Project

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

SLO Planning Commission
Attn: Jennifer Guetschow

Dear County Commissioners:

I am writing to express my concern regarding the Proposed Dana Reserve Project, a development project that will develop 288 acres in the Unincorporated County Community of Nipomo.

After reading the Draft Environmental Impact Report (DEIR), the Unmitigatable Significant Class 1 issue which concerns me most is the **environmental and biological impact of the planned development** in a sensitive biological and the dire water issues our county and state are facing. It is time to prioritize the environment if we want to sustain the lives we love here on the Central Coast – and indeed to preserve life at all. RD-1

My other concerns include: RD-2

- Imbalanced housing vs job creation
- Increased traffic congestion RD-3
- Air quality, exacerbating our existing problems since the ever-expanding Trilogy development RD-4
- Land planning: Multiple elements of the project are out of alignment with the south county area plan, including how this land was intended to be developed vs the present project RD-5
- Biological impacts – RD-6
    - 3,948 oak trees to be removed
    - federally endangered species to be displaced or destroyed
    - special habitats to be destroyed
- **Again, the water situation is dire and this development will only make it worse** RD-7

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. The benefits will be felt by a few, while the negative effects ripple out to everyone – and to the essential non-human inhabitants of our community. RD-8

As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837. RD-9

Sincere thanks,

Ruth Danielson
Nipomo Resident
rdanielson@msmarketintel.com

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9.5.115.1 Response to Letter from Ruth Danielson

Comment No.	Response
RD-1	This comment expresses concern related to biological resources and water supply. Refer to BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
RD-2	This comment raises concern regarding the project's impacts on the jobs-to-housing balance. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance.
RD-3	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
RD-4	This comment raises concern regarding air quality. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions and DMW-3, which addresses comments related to dust.
RD-5	This comment expresses concerns related to the project's consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
RD-6	This comment expresses concern related to biological resources. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
RD-7	This comment expresses concern related to water supply. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
RD-8	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
RD-9	This comment suggests denial of the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.116 Diana Daugherty

Jennifer Guetschow

From: Diana Daugherty <djd46@msn.com>
Sent: Monday, August 1, 2022 12:11 PM
To: Jennifer Guetschow
Subject: [EXT]Nipomo reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

I hate to see the "big money " conglomerates be able to gobble up the beautiful landscape here. How do they expect to furnish water to the new households?
San Luis County should be ashamed for letting money come before the environment. Isn't there someone who will stand up?
I am ashamed!
Diana Daugherty
A property pentimento Nipomo for 36 years

DDa-1

Sent from my iPhone

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9.5.116.1 Response to Letter from Diana Daugherty

Comment No.	Response
DDa-1	This comment raises concern regarding water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.117 Joshua Erdman



Delete Archive Report Reply Reply all Forward

[EXT]Dana Reserve

JE Joshua Erdman <josh@gettorchlight.com>
To: Jennifer Guetschow
Mon 8/1/2022 2:45 PM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer,
I was excited to learn about the Dan a Reserve project. As a local business owner and resident of Nipomo I feel that this project would be helpful for the local community and well the County Economy.

For me, the most valuable part of the plan is how this project will utilize the drinking water commitments that Nipomo CSD has already with the City of Santa Maria. Water is already expensive here and my understanding is that Nipomo is contracted with the City of Santa Maria to pay for more water than we can currently use. If we do not grow, our contractual commitment will require additional water fees applied to Nipomo Residents. I know this may sound counterintuitive - "add more people and facilities to save on water", please take the time to look into this and understand how this can help reduce Well water usage.

The Central Coast is always short on housing and these additional housing units will allow Nipomo to grow without losing its small town appeal.

Thank you for taking the time to consider my input.
Sincerely,

Joshua Erdman | CEO
Torchlight Marketing
Direct: (805) 202-4212

Google Ads | SEO | Reputation Management

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Reply Forward

JEr-1

JEr-2

JEr-3

9.5.117.1 Response to Letter from Joshua Erdman

Comment No.	Response
JEr-1	This comment expresses support for the proposed project. No revisions to the EIR are necessary.
JEr-2	This comment expresses support for the proposed project due to the utilization of drinking water commitments. No revisions to the EIR are necessary.
JEr-3	This comment expresses support for the proposed project due to the provision of housing along the Central Coast. No revisions to the EIR are necessary.

9.5.118 Lou Anne and Clyde George

Jennifer Guetschow

From: Lou Anne Lockwood George <l.lockwood@sbcglobal.net>
Sent: Monday, August 1, 2022 12:02 AM
To: Jennifer Guetschow
Cc: Lou George; Clyde George
Subject: [EXT]Fwd: Dana Reserve Development EIR

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

>
> We are writing to state our disapproval and related concerns about the proposed Dana Reserve Development (EIR). LACG-1
>
> Our family has lived on a 1-acre rural lot in nipomo since 2003. We do not have a fancy home, our kids went to Nipomo schools, we ride horses and are part of the local community.
>
> The past few years we have already experienced increasing problems
> with traffic congestion, extensive water use reduction requirements due to sustained drought conditions, and electrical brownouts due to electricity overuse by our local and neighboring community. LACG-2
>
> Now a developer with deep pockets and apparent political clout is proposing to cut down over 3000 oaks trees, disturb natural habitats and local wildlife to build an incredibly population dense housing development that will literally increase the population of Nipomo by 26% in one fell swoop with no need to mitigate the absolutely foreseeable problems that will be created such as even greater road congestion and commuter traffic, congested access to local resources of all kinds and extensive added water usage just to name a few. LACG-3
>
> Not sure why Nipomo is being targeted to be the County wide solution to the need for more housing for local workers. Especially since a majority of the proposed new residents won't be working in Nipomo but more likely will be commuting to Santa Maria or SLO or elsewhere in the two counties. LACG-4
>
> Building a park and walking trails and a satellite college location LACG-5
> (bringing still more traffic) does not make up for sitting in morning traffic for 15-20 minutes to make what should be the 5 minute drive from our home to the freeway every morning or having the currently dark night sky lit up with street lights from a huge housing development. LACG-6
> In case you did not know this, Nipomo is a community that holds the viewing of the night sky to be of great value.
>
>
> Thank you for your consideration of our concerns.
>
> Lou Anne and Clyde George
> 490 Lantana Street
> Nipomo, Ca
> 93444
> 805 705-6215
>
>
>
>
> Sent from my iPhone

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9.5.118.1 Response to Letter from Lou Anne and Clyde George

Comment No.	Response
LACG-1	This comment identifies this commenter's background as it relates to the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LACG-2	This comment raises concern regarding traffic congestion, extensive water use, and overuse of electricity. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; and DSC-8, which addresses comments related to electrical infrastructure.
LACG-3	This comment raises concern regarding the loss of oak trees at the project site, the density of proposed housing and population growth, traffic congestion, and water use. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site; BR-2, which addresses comments related to population and housing growth; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; and MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
LACG-4	This comment suggests that the proposed project would facilitate housing for workers in the city of San Luis Obispo and/or city of Santa Maria. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LACG-5	This comment raises concern regarding an increase in traffic congestion and nighttime lighting. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements and DT-1, which addresses nighttime lighting.
LACG-6	This comment raises concern regarding an increase in nighttime lighting. Refer to DT-1, which addresses nighttime lighting.

9.5.119 Lila Henry

Jennifer Guetschow

From: Lila Henry <henrylila42@yahoo.com>
Sent: Monday, August 1, 2022 4:39 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,

Here are some objections to the Dana Reserve Plan as it is described in the EIR.

The area that the Dana Reserve will occupy is currently zoned Rural Residential which would accommodate 38 houses. This project would rezone the area to its specifications, which is for 1,289 units. This density goes against all the South County Development plans currently in place. It changes a rural neighborhood into a small city which poses many problems. LH-1

There is a basic conflict in the concept of this development. One the one hand, they will not include any stores that conflict with downtown Nipomo. Then all shopping traffic has to go to downtown. They think that extending the North Frontage Road out to Willow will take care of traffic concerns. North Frontage Road leads on to Mary St. to access Tefft. If you have ever been at that intersection on a Sunday afternoon when the Swapmeet and Flea Market get out you know that it is almost impossible to get through. Adding, say, another 300 cars is impossible. (300 equals less than a fourth of the proposed units. Actually units could have 2 cars per house.) LH-2

There are nine Class I: Significant and unavoidable impacts. They are all in areas significant to quality of life in Nipomo. LH-3

BIO Impact 4: The project could directly and indirectly impact CRPR 4 and Watch List plant species, including California spineflower, sand buck brush, and sand almon

BIO Impact 20: The project would have cumulatively considerable impacts related to biological resources

GHG Impact 3: The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases

GHG Impact 5: The project would result in a cumulatively considerable impact to greenhouse gas emissions

LUP Impact 10: The project would result in cumulative impacts associated with

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inconsistency with goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character

PH Impact 1: The project would induce substantial unplanned population growth in the

Nipomo area

PH Impact 5: The project would result in a cumulatively considerable impact related to substantial and unplanned population growth

TR Impact 9: The project would result in a cumulatively considerable impact to

transportation and traffic

GI Impact 1: The project would result in substantial growth inducement associated with the proposed project's population as well as the potential to induce additional spatial, economic, or population growth in a geographic area.

LH-3 (cont'd)

There are also areas they consider to be mitigable that are not. The mitigation proposed for Clarkia has been proven to not work. The mitigation for cutting down 3,948 oak trees and "preserving" trees in another location where they are not even threatened is illogical. LH-4 LH-5

I am sure many comments have mentioned water. The plan says it is bringing in water from Santa Maria, and Santa Maria gets state water. The whole state in a drought. State water is by no means assured to Santa Maria. LH-6

The plan says it is to provide housing for median income people in SLO county. According to census.gov $25,000 is median income for the county. With that salary if you put $10,000 down and have a good credit rating the bank says you could qualify for $100,00 - $150,000 loan. Even if you make $40,000 you would not qualify for $600,000 loan, which is what a "median income" house would be selling for in Dana Reserve. $40,000 is starting pay for a teacher in SLO county. This is not to mention people working for minimum wage, $31,200/year. LH-7

Would Dana Reserve consider putting in tiny houses for homeless people? LH-8

This project should revert to rural residential and drop the proposal of providing middle income housing, which it doesn't even accomplish. LH-9

Sincerely,
Lila Henry
henrylila42@yahoo.com

2

9.5.119.1 Response to Letter from Lila Henry

Comment No.	Response
LH-1	This comment asserts that changing the current zoning of the parcel would be inconsistent with the community and applicable planning documents. Refer to PH-1, which addresses the project's compatibility with the community and ES-1, which addresses comments related to applicable planning policies.
LH-2	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
LH-3	This comment identifies the project's Class I impacts. Refer to DT-2, which addresses this comment.
LH-4	This comment asserts that the mitigation for Pismo clarkia is inadequate. Refer to KK-19, which addresses comments related to Pismo clarkia.
LH-5	This comment raises concern regarding the loss of oak trees at the project site and associated mitigation. Refer to MR-3 and JK-4, which addresses this comment.
LH-6	This comment raises concern regarding the availability of water supply during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
LH-7	This comment raises concern regarding the affordability of proposed residential units. Refer to KK-11, which addresses comment related to affordable homes.
LH-8	This comment questions whether the proposed development would include housing for homeless populations. Chapter 2, *Project Description*, of the EIR does not specify development of residential units for homeless populations. Refer to KK-11, which addresses comment related to affordable homes. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
LH-9	This comment asserts that development at the site should remain consistent with the existing Rural Residential land use designation. Refer to AG-3 and AG-4, which address comments related to project alternatives.

9.5.120 Dolores Howard

Jennifer Guetschow

From: Dolores Howard and Roberto Le-Fort <lefortsorganiccrops@gmail.com>
Sent: Monday, August 1, 2022 9:33 AM
To: Jennifer Guetschow
Subject: [EXT]Comments on Draft EIR for Dana Reserve Specific Plan

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Ms. Guetschow,

I am writing to you to express my deep concerns about the draft EIR for the Dana Reserve Specific Plan. I believe that the project as proposed is much too big for the site and, as the Draft EIR shows, will mean significant and unavoidable impacts to biological, air quality, and aesthetic resources. The alternatives proposed and possibly other alternatives, need to be studied much more deeply than what the Draft EIR covers, in order to find solutions to the serious impacts that the project will have on the health of our county. Some of my concerns are listed below in the form of quotes, some in bold, and a few comments of mine, in italics: DH-1 DH-2

Aesthetics

4.1.1.3 Primary View Corridors (pages 4.1-6 to 4.1-7)
Scenic corridors are view areas, or "viewsheds," from public roads and highways that have unique or outstanding scenic qualities. Principal travel corridors are important to an analysis of aesthetic features because they define the vantage point for the largest number of viewers. The California Department ofTransportation (Caltrans) has not officially designated any routes within the vicinity of the Specific Plan Area as scenic highways. **However, the Caltrans Scenic Highways Map shows US 101 as "Eligible" for designation as a scenic highway. In addition, the County of San Luis Obispo General Plan considers US 101 as a candidate scenic corridor.** The County has adopted Highway Corridor Design Standards along US 101 that address residential and related development; a portion of the Specific Plan Area frontage along US 101 is mapped within the County's Highway Corridor Design Standards area. **US 101 carries an average of approximately 65,000 vehicles per day through Nipomo and past the Specific Plan Area (Caltrans 2017).** *These are vehicles that carry people that live and work in this county as well as visitors to this county or individuals that may or may not visit our county as a result of what they see from the freeway. This project should not be designed to have such a negative visual impact on all of us that travel by, and in fact, the visual impact of this project is inconsistent with the plans and policies of our county, as listed below. The Draft EIR should be revised and recirculated to address alternatives that would not be inconsistent with these plans and policies that are written to protect the special qualities of our county.* DH-3 DH-4

1) County of San Luis Obispo General Plan Conservation and Open Space Element
GOAL 2. The natural and historic character and identity of rural areas will be protected. The intent of this policy is to preserve the rural and historic visual character of the county.
Preliminary Consistency Determination: Potentially Inconsistent. The project would ***inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration.***

2) Policy VR 2.1 Develop in a manner compatible with Historical and Visual Resources. Through the review of proposed development, encourage designs that are compatible with the natural landscape and with recognized historical character, and discourage designs that are clearly out of place within rural areas. The intent of this policy is to preserve the rural, scenic, and historic visual character of the county. DH-5

Preliminary Consistency Determination: Potentially Inconsistent. The project would be ***inconsistent with the existing rural visual character of the site and surrounding natural landscape*** through the introduction of commercial,

1

institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration.

3) Policy VR 2.2 Site development and landscaping sensitivity. Through the review of proposed development, encourage designs that emphasize native vegetation and conform grading to existing natural forms. Encourage abundant native and/or drought-tolerant landscaping that screens buildings and parking lots and blends development with the natural landscape. Consider fire safety in the selection and placement of plant material, consistent with Biological Resources Policy BR 2.7 regarding fire suppression and sensitive plants and habitats. The intent of this policy is to preserve existing natural landforms and native vegetation to maintain the rural, scenic, and historic visual character of the county.

Preliminary Consistency Determination: Potentially Inconsistent. Although the project site would preserve the existing oak ridge, it would ***severely alter the existing native vegetation and natural landforms of the remainder of the site with the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees;***

4) Framework for Planning (Inland) Planning Principles, Policies, and Implementing Strategies Principle 1: Preserve open space, scenic natural beauty, and natural resources. Conserve energy resources. Protect agricultural land and resources. The intent of this policy is to protect existing visual quality and character.

Preliminary Consistency Determination: Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would ***inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.***

5) Framework for Planning (Inland) Planning Principles, Policies, and Implementing Strategies Policy 1. Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character. The intent of this policy is to preserve the rural character of the county.

DH-5
(cont'd)

Preliminary Consistency Determination: Potentially Inconsistent. Although the Specific Plan Area is planned for development in the County's existing General Plan, and the project would preserve the existing oak ridge, the project ***would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.***

6) **County of San Luis Obispo Land Use Ordinance 22.10.095 – Highway Corridor Design Standards D. 5. Project Design and processing** – Discretionary permit applications. Minor Use Permit approval is required for projects subject to Subsection D.4 that are unable to meet the requirements for a Zoning Clearance in Standards D.4.c through D.4.h. Minor Use Permit and any Conditional Use Permit applications that may otherwise be required by this Title shall include a visual analysis that is prepared by a registered architect, landscape architect, or other qualified individual acceptable to the Environmental Coordinator. The visual analysis shall be utilized to determine compliance with the intent of D.4 and the following: a. ***Locate development, including access roads, in the least visible portion of the site consistent with the protection of other resources, as viewed from Highway 101, unless mitigated to insignificant levels.*** Use existing vegetation and topographic features to screen development from view as much as possible. b. Minimize grading for both structures and roads that would create cut and fill slopes visible from Highway 101. c. Minimize building height and mass by using low-profile design where applicable. Minimize the visual impacts of buildings by using colors that blend with surrounding natural colors and/or screen the building from view. d. Provide landscaping to screen and buffer both road and building development with native or drought resistant plants, including the extensive use of trees and large-growing shrubs. e. Use of minimal signage is encouraged. Locate signs that are subject to a discretionary land use permit so that they minimize interference with important public views from Highway 101, such as those listed in the preamble to this section. The intent of this policy is to require visual impact assessments for residential development within the US 101 corridor for the purpose of preserving visual quality and character.

2

Preliminary Consistency Determination: Potentially Inconsistent. ***The project would inherently change the visual character of the site and surroundings through the introduction of roads, commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration within highly visible locations as seen from US 101.*** Mitigation Measure AES/mm-3.1 would require implementation of a Visual Screening Zone along the length of the project site adjacent to the required utility easement and US 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. ***The proposed landscaping would, by necessity, be more urban in appearance and would likely take several decades to provide meaningful restoration of the vegetative character and quality of the site.***

7) South County Inland Area Plan South County (South) Sub-area Guideline: Retain land in open space in new land divisions that will preserve oak woodlands, riparian and other important biological habitats, and historic place surroundings. The intent of this policy is to maintain the scenic, historic, and biological qualities of the county's open spaces.

Preliminary Consistency Determination: Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would ***inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.***

DH-5 (cont'd)

8) Primary Goals 4. The rural character and heritage of South County with a strong sense of identity and place. The intent of this policy is to preserve the rural visual qualities of the South County planning area.

Preliminary Consistency Determination: Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would ***inherently change the visual character of the site and surrounding landscape through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration.***

9) 6. The long-term sustainability of natural resources as growth occurs with sensitivity to the natural and built environment. The intent of this policy is to maintain a long-term balance between development and the natural environment.

Preliminary Consistency Determination: Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would ***inherently change the visual character of the site and surrounding landscape through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oaks ; and substantial landform alteration.***

Greenhouse Gas Emissions/Air Quality/Transportation

There is significant and unavoidable impact in Vehicle Miles Traveled in the proposed project, as seen in the Draft EIR sections on Air Quality, Greenhouse Gas Emissions and Transportation. As climate change accelerates, now is not the time to have these kinds of impacts. In addition, there are several inconsistencies with County plans and policies in these areas, as found in the Draft EIR.

DH-6

County of San Luis Obispo General Plan Conservation and Open Space Element Policy AQ 1.2 Reduce vehicle miles traveled. Require projects subject to discretionary review to minimize additional vehicle travel. The intent of this policy is to reduce VMT on a project-by-project basis.

DH-7

Preliminary Consistency Determination: Potentially Inconsistent. Buildout of the DRSP ***would result in an increase in overall VMT and VMT per employee even with implementation of Mitigation Measure TR/mm-3.1.***

3

There is an Inconsistency with the Sustainable Communities Strategy as well in the Greenhouse Gas Emissions section, relating to: Infill Development and Location Efficiency 8. Support mixed-use and infill development near existing transit services and activity centers. (Ongoing) This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.

Preliminary Consistency Determination: Potentially Inconsistent. The DRSP proposes a mix of residential, commercial, and open space uses outside of the existing Nipomo URL. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service, and is generally surrounded by existing residential development; **however, the project does not propose infill development and does not promote location efficiency.**

DH-7 (cont'd)

The Dana Reserve Specific Plan proposes to create negative consequences, including adding to the Jobs-Housing imbalance, as well as poor solutions to affordable housing, public services and recreation. The serious and long-term picture of climate change requires a much more thoughtful response to alternatives that would avoid the significant impacts to air quality, aesthetics, oak woodland and other biological resources, some of which are unique to very few parts of the world. Better alternatives need to be addressed in a revised Draft EIR for the Dana Reserve Specific Plan.

DH-8

Thank you for the opportunity to comment on this,

Dolores Howard
Creston resident



4

9.5.120.1 Response to Letter from Dolores Howard

Comment No.	Response
DH-1	This comment expresses this commenter's opposition to the proposed project and raises concern regarding the density of the proposed project and the project's Class I impacts. Refer to BR-2, which addresses comments related to population growth and DT-2, which addresses comments related to the project's Class I impacts.
DH-2	This comment raises concern regarding the alternatives analysis. Refer to AG-3 and AG-4, which address comments related to project alternatives.
DH-3	This comment reiterates the analysis included in Section 4.1, *Aesthetics*, of the DRSP EIR. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
DH-4	This comment raises concern regarding the project's Class I impacts related to aesthetic resources and asserts that alternatives should be developed which are consistent with applicable planning policies. Refer to CB-1, which addresses comments related to the project's visual impacts and AG-3 and AG-4, which address comments related to project alternatives.
DH-5	This comment reiterates the project's inconsistency with applicable planning documents, which have been identified in the EIR. Refer to ES-3, which addresses comments related to applicable planning policies.
DH-6	This comment reiterates the project's Class I impacts related to air quality and greenhouse gas emissions in addition to the project's inconsistency with applicable planning documents. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions and ES-3, which addresses comments related to applicable planning policies.
DH-7	This comment reiterates the project's inconsistency with applicable planning documents, which have been identified in the EIR. Refer to ES-3, which addresses comments related to applicable planning policies.
DH-8	This comment raises concern regarding jobs-to-housing balance, affordable housing, public services, recreation, and climate change. The comment asserts that additional alternatives should be developed to reduce the project's Class I impacts. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance; KK-11, which addresses comments related to affordable homes; MR-2 and KE-3, which responds to comments related to public services; KK-10, which addresses comments related to recreation; and GRo-3, which responds to comments related to air quality and greenhouse gas emissions. Additionally, refer to AG-3 and AG-4, which address comments related to project alternatives.

9.5.121 Herb Kandel

Jennifer Guetschow

From: Herb Kandel <herbkandel@gmail.com>
Sent: Monday, August 1, 2022 11:46 AM
To: Jennifer Guetschow
Subject: [EXT]Re: Comments on Draft EIR for Dana Reserve Specific Plan

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Ms. Guetschow,

Following are additional comments to the Draft EHR for the proposed Dana Reserve development.

Currently, Mitigation for oak trees does not differentiate mitigation requirements for the size of the tree, known as "DBH" (diameter at breast height). That is, a 3 or 6 inch diameter tree is replaced at the same ratio as a 3 foot or a 6 foot diameter tree. The multiple benefits of the larger trees are exponential, habitat provision, carbon sequestration, aesthetics, etc. This oversight should be corrected in the requirements for mitigation. HK(2)-1

The scope of this project relative to cumulative impacts comes along once every 20 years. Many of the regulations and tools for development considerations are built for smaller impact projects. Some of the measures and tools for regulation and mitigation are not ready for the challenge of this project. For example, the Public Works department most often seeks in its planning a new road to minimize incidental impacts to a few trees here or there. The impacts of emissions during construction focus on dust abatement and some but inadequate look at fossil fuel emissions. A project of this size and scope requires stepping back to look at our inadequate piecemeal approaches to planning, permitting and mitigation. HK(2)-2

Planning and public works should include current scientific understanding and a systems analysis to look holistically at the project's impacts that take into account aspects including but not limited to:
1. Cumulative climate impacts from the project;
2 . Project redesigns to meet these holistic standards, e.g. retain existing oak woodland canopies
3. Accounting for measurable impacts of the delay time from species removal to implementation of mitigation measures.
4. Documenting prior local habitat losses with in the area to look at trends of impacts and loss to specifically assess regional impacts;
5. Identification of habitat corridors that still exist and where offsite mitigations have the most impact.
6. A comprehensive plan for mitigation banking should be initiated. HK(2)-3

This project calls upon us to initiate the relevant planning tools to meet the scope of this project. HK(2)-4

1

This project is not ordinary, and these times are not ordinary-- we need to improve our tools and assessment. If anything good may come from this proposal, it will require improved and up to date approaches.

HK(2)-4 (cont'd)

Sincerely,

Herb Kandel
776 Inga Rd
Nipomo

On Sun, Jul 31, 2022 at 11:44 PM Herb Kandel <herbkandel@gmail.com> wrote:

> Dear Jennifer Guetschow,
>
> Please find my attached comments for the public record with comments and questions referencing the draft EIR for the Dana Reserve Specific Plan.
>
> Please let me know that you received it,
>
> Thank you!
>
> Herb Kandel
> 776 Inga Rd.
> Nipomo,

2

9.5.121.1 Response to Letter from Herb Kandel

Comment No.	Response
HK(2)-1	This comment asserts that the proposed mitigation for restoration of oak trees should include replacement of trees at a similar diameter at breast height (dbh) of those removed. Refer to MR-3 and JK-4, which responds to comments related to loss of oak trees.
HK(2)-2	This comment asserts that current planning, permitting, and mitigation strategies conducted by the County are inadequate and existing measures are inadequate for a project of this size. Examples included in the comment include measures for trees and greenhouse gas emissions. Refer to MR-3 and JK-4, which addresses comments related to mitigation for oak trees and Gro-3, which addresses comments related to greenhouse gas emissions. This comment does not identify any deficiency in this EIR; therefore, no changes in the environmental document are necessary.
HK(2)-3	This comment identifies a new strategy for planning, which includes an evaluation of cumulative climate impacts, project alternatives intended to reduce significant impacts, timing, documentation of existing conditions, and residual impacts. As identified in Chapter 4, *Environmental Impact Analysis*, the DRSP EIR was prepared in accordance with State CEQA Guidelines, which includes these methods. This comment does not identify any deficiency in this EIR; therefore, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
HK(2)-4	This comment suggests creating and incorporating new planning tools. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.

9.5.122 Nathan Schleifer

Delete Archive Report Reply Reply all Forward

[EXT]Impact for the Dana Reserve Project

NS Nathan Schleifer <nathan@tolife.email>
To: Jennifer Guetschow
Mon 8/1/2022 10:22 AM

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hello Jennifer,

I am concerned that the positive impacts from the Dana Reserve Project will not overcome the negative social and economic benefits of the project. **NS-1**

My main concern is the impact that the water required for the additional homes will not be sustainable. Our family has been very careful to protect and save the water that the community has. How can adding 2500 homes be sustainable? **NS-2**

We need to have a study done as to how much the current community uses and how much more the new development will use and make sure that there is enough water for the new houses. It is not fair to the current community if our water situation becomes an emergency because of the new development. **NS-3**

The traffic is a big concern and should be fully implemented before any building starts. The developer should not be able to walk away without doing the work to support the development. **NS-4**

The beautiful landscape that we see now is going to go away. I will be sending some images that I now enjoy in the next email. The developer should have to pay for each Oak tree they cut down (the same amount that I have to pay). That will greatly make them plan better for the beauty of the development. **NS-5**

The cost of the housing does not support employees. They cannot afford the housing so how is it going to help with providing housing to workers?

Face it. The developer and land owner are going to profit hugely at the expense of the local community. Our local officials need to fight for the local community. **NS-6**

Please help us eliminate this blight on our community or limit it by reducing the number of homes associated.

Sincerely

Nathan Schleifer

--
e: nathan@tolife.email
p: 805.929.5206

[EXT]The view that we have of this property is worth too much

Nathan Schleifer <nathan@tolife.email>
Mon 8/1/2022 10:25 AM
To: Jennifer Guetschow <jGuetschow@co.slo.ca.us>

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Here is one photo of the Dana Reserve Property. We need to protect it. This is from Pomeroy looking north.



NS-7

Sincerely

Nathan Schleifer

--
e: nathan@tolife.email
p: 805.929.5206
c: 805.868.0750

9.5.122.1 Response to Letter from Nathan Schleifer

Comment No.	Response
NS-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
NS-2	This comment raises concern regarding sustainable water supply. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
NS-3	This comment raises concern regarding the adequacy of the water studies conducted for the project. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions and Gre-11, which addresses comments related to the adequacy of the water studies.
NS-4	This comment raises concern regarding implementation of roadway improvements. Refer to JK-7, which addresses comments related to roadway improvements.
NS-5	This comment raises concern over the change in landscape due to the loss of oak trees at the project site and suggests the developer pays for each oak tree that is removed from the site. Refer to BR-1, which addresses comments related to habitat loss and wildlife and MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
NS-6	This comment raises concern regarding affordable housing. Refer to KK-11, which addresses comments related to affordable housing.
NS-7	This comment includes a photograph of the landscape. No revisions to the EIR are necessary.

9.5.123 Eva Ulz

Law Offices of **Babak Naficy**

1124 Nipomo St
Suite C
San Luis Obispo
California 93401
ph: 805-593-0926
fax: 805-593-0946

babaknaficy@sbcglobal.net

VIA EMAIL AND BY HAND

August 1, 2022

County of San Luis Obispo
Department of Planning and Building
Attn: Dana Reserve/Jennifer Guetschow
976 Osos Street, Rm 300
San Luis Obispo, CA 93408
JGuetschow@co.slo.ca.us

Re: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow, et al:

I am writing to endorse the Northern Chumash Tribal Council's comments on the Dana Reserve Specific Plan Draft Environmental Impact Report (DEIR) and to raise the additional, overlapping issue of the grossly inadequate historical analysis of the Project area. **EUI-1**

The undersigned, Eva Ulz, was executive director of the History Center of San Luis Obispo County from 2014 to 2018. Ms. Ulz has served on the Dana Adobe Nipomo Amigos (DANA) board of directors and acted as its interim executive director for several months in 2018. Ms. Ulz also served on the California Preservation Program Steering Committee and the City of San Luis Obispo's Jack House Committee. She currently serves as chair of the City of San Luis Obispo's cultural heritage committee and is a member of the California Preservation Foundation education committee. **EUI-2**

The DEIR failed to consult local archives.

No information is given regarding the specific "literature and data review" or "background research" used in the preparation of Section 4.5 "Cultural Resources" of the DEIR, however, according to Subsection 4.5.1.3.1 "Records Search," it appears that no local archives were consulted. Relevant information exists in the research libraries and collections of the History Center of San Luis Obispo and Dana Adobe Nipomo Amigos (DANA). Additionally, relevant information may also be in the Cal Poly Special Collections, South County Historical Society, and other local archives. **EUI-3**

The History Center was formed in the 1950s—in partnership with the County and City of San Luis Obispo—and acquired the Dana Adobe shortly thereafter, eventually passing the property to the Dana Adobe Nipomo Amigos (DANA) decades later. The History Center maintains a research library and historical archive which contains significant primary and secondary sources regarding the history of Rancho Nipomo, the nearly 38,000-acre Mexican land grant to Captain William Goodwin Dana in 1837.

DANA also maintains a library of books, documents, and research regarding the history and evolution of the Dana family and Rancho Nipomo throughout the 19th and 20th centuries.

As a result, Section 4.5.1 "Cultural Resources: Existing Conditions" omits critical local historical context.

Had the local sources described herein been consulted, the DEIR would likely not be entirely bereft of local historical context. For example, the DEIR recites generic Mission-era history but fails to include any meaningful mention of Rancho Nipomo, including the fact that the entire Nipomo area was under unified ownership of the Dana family for much of the 19th century and operated as working ranchero.

Likewise, no mention is made of Nipumu, the Chumash village that existed there long before and up to and including the rancho era; some local historians believe that villagers may have worked as vaqueros on the Danas' rancho.

Neither is there any information about the agricultural revolution that took place in Nipomo after the droughts of the 1860s broke the ranchos. Dorothea Lange's famous "Migrant Mother" photograph was taken in Nipomo during the dustbowl migration of the Great Depression. Several years later, the culturally and ethnically diverse Nipomo farming community was shaken by the Japanese Internment.

Omission of local historical context from the description of the existing conditions at and surrounding the Project area is a fatal flaw because it precludes the DEIR's ability to identify and disclose potentially significant adverse impacts to the historical and cultural resources that communicate these historical events and themes—many of which have statewide, if not national, significance.

EUI-3 (cont'd)

EUI-4

EUI-5

EUI-6

There is substantial evidence that the 0.25-mile radius adopted for cultural resources identification is inadequate. EUI-7

DEIR Subsection 4.5.1.3.1 announces without explanation that the search for existing cultural resources was limited to a 0.25-mile radius around the Project Area. However, as explained above, the complex history of land ownership in the Nipomo area clearly shows that such a limitation is both arbitrary and inadequate, particularly in light of the fact that certain off-site Project improvements have not yet been located and will almost certainly be sited as to adversely impact historical and cultural resources. EUI-8

Although the Dana Adobe now sits on less than 2 acres (adjacent to a 100-acre County-managed open space), the historical boundaries of the rancho encompassed nearly all of modern Nipomo. The DEIR's failure to recognize and disclose this essential fact, inter alia, shows that not only does the DEIR provide no evidence provided to support the apparently arbitrary 0.25-mile radius, but there is substantial evidence that supports requiring a much wider ranging inquiry. EUI-9

Given the complete lack of any local historical context and omission of easily discovered and highly relevant facts—particularly in the face of the DEIR's apparent reliance on a generic Mission-era historical statement—it is questionable whether such significant deficits can even be remedied by a response to comments. In my opinion, the only adequate remedy for these omissions is a revised and expanded historical and cultural resources report. EUI-10

Sincerely,



Eva Ulz
Certified Law Clerk
Supervised by Babak Naficy

Cc: Northern Chumash Tribal Counsel; Babak Naficy

Northern Chumash Tribal Council
A Native American Corporation
PO Box 6533, CA 93412 (805) 356-6149

CHUMASH HERITAGE
National Marine Sanctuary

County of San Luis Obispo
Department of Planning and Building
ATTN: Dana Reserve/Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

The Northern Chumash Tribal Council (NCTC; the Tribe) submits the following comments on the Cultural Resources and Tribal Cultural Resources sections of the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (the Project). In general, we find these sections of the DEIR are poorly written and demonstrate a general lack of familiarity with the local resources. Many of their conclusions and recommendations aren't substantiated with facts or reasonable assumptions based on facts. Moreover, the requirements of CEQA regarding the evaluation of California Register of Historic Places (CRHR) eligibility, impact assessment, and mitigation are skirted or ignored outright.

Section 4.5.1, Existing Conditions

EUI-11

The section does not demonstrate any understanding of the local history, prehistory, or archaeology which is the necessary context for the assessment of impacts on sites in the Project area. It completely ignores the Chumash history of Nipomo and lacks any discussion of local sites of importance to which the resources in the Project area may be related. The ethnographic overview even fails to mention the most relevant Chumash place in the region, *Nipumu*, the Northern Chumash village for which the current town of Nipomo is named. This is a substantial oversight that demonstrates the lack of knowledge regarding the study area. CA-SLO-809, the archaeological site associated with that village, is less than a mile away from the Project and should have been mentioned as the most substantial and well-known site in the area, even though it's beyond the arbitrary quarter-mile radius of the records search. The excavation at CA-SLO-809 is still the most substantial excavation in the local area; its findings provide the basis for the local prehistoric cultural sequence and should have been referenced in the overview section. Another omission has to do with the well-known discovery of a Clovis point in the hills surrounding the valley, substantiating the Late Paleoindian use of the area.

The Euro-American history of Nipomo is simply glossed over as well. There is no historical overview, even though the ranching history of the area is mentioned in passing and one historical archaeological site was identified in the project area. The Dana Rancho gets no mention anywhere, a considerable oversight since it provides critical historical context for the study area (and considering the Project name), even if the Adobe itself is more than 0.25 miles distant. In general, this section is poorly written, sloppy, and internally inconsistent. In addition to the omissions already noted, it also contains factual errors. For example, Mission San Fernando Rey is not in the Chumash territory, as stated on pages 4.5-2; it is in the Tataviam/Gabrielino area.

Section 4.5.13, Existing Cultural Resources

The DEIR glosses over the history of the project area and writes off one site (P-40-002271) as insignificant because it is "undoubtedly historic" (pg 4.5.2-8) without providing evidence or explaining how they determined its age or reached this judgment regarding its significance. This information should be provided. Given the proximity of the Dana Adobe and the known historic uses of the area, this judgment should be reconsidered (or at least better supported).

Since all these sites seem to contain marine shells that can be dated using radiocarbon, please explain why that wasn't done. Such dating would have helped in evaluating the eligibility of these sites for the CRHR and assessing potential Project impacts.

It does not appear that there has been any study of the proposed offsite conservation area/mitigation lands over in the hills on the other side of the valley. This area is part of the Project and should have been studied at the same level. In our experience, there are activities related to biological mitigation, water and range management, and other activities that could occur on these lands and would definitely impact any cultural resources present.

Section 4.5.1.3.2, Native American Coordination

EUI-11 (cont'd)

This section refers to a positive response from the Native American Heritage Commission (NAHC) but there was no effort to identify the nature or location of sacred lands in the Project area so they could be protected. The reader is referred to Section 4.18 for a description of tribal consultation, but that section doesn't discuss sacred lands and the NAHC response was not disclosed to NCTC or other tribal consultants. We received no response to our additional inquiries to the County about this matter. For these and other reasons, consultation is not completed to our satisfaction. If there are identified sacred sites they have to be considered in the early planning stages so they can be respected and protected. The County should require an ethnohistoric study to identify sacred sites so Project impacts can be identified and mitigated.

Section 4.5.4, Impact Assessment and Methodology

The County will assume that archaeological sites DR-001, P-40-2132, and P-40-2273 are eligible for the California Register for the purposes of the project, and are thus historical resources under CEQA, but the DEIR does not explain what qualities these sites have that would make them CRHR-eligible (Section 4.5.4, pp 4.5-16). Please provide this information. The DEIR avers that this assumption is based on the results of the Extended Phase 1 (XP1) investigation, but the XP1 study was only intended to define the vertical and horizontal extent of identified archaeological resources (i.e., the boundaries of the archaeological sites—see Morgan Bird's 12-13-21 letter report to Senior Planner Jennifer Guetschow). The XP1 was helpful in defining the structure and content of the resources but does not constitute a significant evaluation, which is necessary at this point. This is a critical omission since it is

the Project's effects on those significant qualities of the sites that determine whether an impact is significant. How is the Tribe or the public judge the validity of the County's assumptions or the efficacy of the proposed mitigation without this critical missing information? Please explain why the cultural resources in the Project area were not evaluated for significance. This deficiency must be remedied in order to adequately determine the age of the cultural resources, identify their function(s), define the qualities that make the sites significant and justify recommendations regarding significance, avoidance, and other mitigation measures.

A letter to your department dated 12-13-21 from Cultural Resource Specialist Morgan Bird refers to a subsequent "comprehensive technical report." This report has not been supplied to the Tribe, and we request that it be provided now and that the comment period on the DEIR be extended for 30 days from our receipt of said document to allow us additional time for review and comment.

Section 4.5.5, Project-Specific Impacts and Mitigation Measures

Mitigation measures (MM) CR/mm-1.1 and -3.1 delay environmental review of off-site improvements and defer identification of impacts and MMs to some future unspecified time. They declare that unidentified historical and archaeological resources could be impacted but that those impacts would be less than significant with mitigation. However, these mitigation measures only require preparation of reports and do not specify that resources shall be avoided, or other mitigation. It is improper and inconsistent with CEQA requirements to rely on a future plan or report without additional public review as mitigation now. It is not necessary to know the "precise location" of the offsite improvements. A general area for these potential effects should be identified now, and the architectural/historical/archaeological studies should be completed and reported in the EIR so that design changes can be implemented to avoid any significant resources.

EUI-11 (cont'd)

Please clarify whether the known archaeological sites shall be avoided or not? The EIR uses squishy language. CR/mm-2.1 says the parts of the sites found to contain subsurface deposits "shall be avoided." But then CR/mm-2.2 says, essentially, "oh that's okay, if we can't we'll do data recovery." Which is it, who decides, and when, and what are the circumstances that would preclude avoidance? None of this is specified, as it must be.

Since data recovery through excavation is not the only feasible mitigation for the impacts of this Project, the EIR must explain why avoidance and preservation in place are not feasible or why other measures better mitigate the impacts.

The DEIR notes that subsurface archaeological deposits exist in some small areas, and those areas are "potentially significant." These small areas where they identified subsurface layers are to be protected as ESAs, but the areas are not specified and we're not told where we can find that information, even if it's confidential and controlled. The Tribe requests detailed maps showing the locations of all proposed ESAs, and further requests that the comment period of the DEIR be extended for 30 days following receipt of those maps to allow sufficient time for review and comment.

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The argument that surface deposits without identified subsurface components are not eligible for the CRHR is based on a highly contingent set of assumptions that are not specified in the DEIR and requires substantiation, which might well have been obtained if a realistic program of site testing and evaluation had been carried out. Without meaningful testing results, however, such a conclusion is not justified. For example, a sparse surface deposit that is 8-10,000 years old might well be judged significant, while a similar deposit of only 500 years might not. Since we know that sites of Clovis age (as much as 12,000 years old) exist in the Nipomo area, it is premature to disregard these sparse surface deposits.

Regarding CR/mm-2.2, what does it mean to say "The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any)"? First of all, if there's no physical disturbance why do data recovery? But more importantly, data recovery should be tailored to the significant qualities of the sites and the amount of data needed to answer the questions in the research design. It has nothing to do with the extent of disturbance. If the intent is to have specific measures for the amount of hand excavation, linked somehow to the amount of site disturbance, then that must be specified in the DEIR in some concrete way (either volume of excavation, or percentage of the site, or a ratio of the volume of site disturbance, or some other concrete measure) so the Tribe has an opportunity to review and comment. Such decisions cannot be deferred to some unspecified future time.

When data recovery is the only feasible mitigation, a data recovery plan "shall be prepared and adopted prior to any excavation being undertaken." There are specific requirements for data recovery plans. Even though the CEQA Guidelines allow for certain details of a mitigation measure to be specified project approval when it is impractical or infeasible to include those details during the project's environmental review, it seems perfectly feasible and practical to include the data recovery plan as an appendix to the DEIR in this case. Moreover, it will be impossible to gauge the adequacy of the measure, whether it is proportional to the impacts, and whether there are any residual impacts without knowing the details of the plan.

EUI-11
(cont'd)

MM CR/mm-2.3 calls for a Cultural Resource Protection Plan which may or may not include some level of tribal and archaeological monitoring. The language is unclear. Given the nature of archaeological resources on the Nipomo Mesa there is a high likelihood that sites will be discovered during construction. For that reason, tribal and archaeological monitoring of all ground disturbance should be required as a specific mitigation measure, and not just in the vicinity of known sites. The DEIR should provide details regarding the extent of monitoring required, when it shall occur, by whom, and under what conditions; such details are all omitted. These critical details cannot be deferred to some later, unspecified time. Again, the Tribes and public then have no way of judging the adequacy of the monitoring effort to mitigate impacts.

Along these same lines, there is no explanation of just what should happen when previously unidentified sites are discovered, or when unanticipated artifacts and features are found in the known sites. Please include this information in the DEIR. Definition of these mitigation details cannot be deferred; they must be included as specific measures in the EIR.

9.5.123.1 Response to Letter from Eva Ulz

Comment No.	Response
EUl-1	This comment provides this commenter's intent in responding to the EIR. This comment does not identify any deficiency in this EIR; therefore, no changes in the environmental document are necessary.
EUl-2	This comment provides this commenter's background as it relates to the proposed project. This comment does not identify any deficiency in this EIR; therefore, no changes in the environmental document are necessary.
EUl-3	This comment asserts that the EIR fails to consult local archives. The technical report contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. This comment does not identify any deficiency in this EIR; therefore, no changes in the environmental document are necessary.
EUl-4	This comment asserts that Section 4.5.1 of the EIR omits critical local historical context related to the *Nipumu*. The omission of *Nipumu* will be revised in the section.
EUl-5	This comment asserts that Section 4.5.1 of the EIR omits critical local historical context related to the agricultural revolution. No archaeological evidence, or otherwise indicates the project area includes agricultural development. The setting and background are commensurate with the types of resources present.
EUl-6	This comment asserts that Section 4.5.1 of the EIR omits critical local historical context from the description of existing conditions. The technical report contains an expanded history discussion. Given the lack of significant historic resources (archaeological or built environment), the section's discussion is commensurate with the findings. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. Therefore, no changes in the environmental document are necessary.
EUl-7	This comment asserts that the 0.25-mile radius is inadequate for the proposed project. The comment will be made part of the administrative record and provided to local decision makers for their consideration. Therefore, no changes in the environmental document are necessary.
EUl-8	This comment asserts that the 0.25-mile radius is inadequate for off-site improvements. Off-site improvements are analyzed at the Programmatic level. Therefore, no changes in the environmental document are necessary.
EUl-9	This comment asserts that adequate reference to Dana Adobe was not adequately addressed in the DEIR. There are no documented land uses for the subject parcel to suggest that it ever played a distinctive role in the evolution of Rancho Nipomo. The parcel's acreage appears to have remained unsubdivided from 1878 through the present day. Therefore, no changes in the environmental document are necessary.
EUl-10	This comment suggests preparation of a revised and expanded historical and cultural resources report. The comment will be made part of the administrative record and provided to local decision makers for their consideration.
EUl-11	The commenter has included the NCTC comment letter as an attachment. Please refer to Section 9.3.13 for responses to the NCTC comments.

9.5.124 Eric Urbain

Jennifer Guetschow

From: Eric U <ericu35120@gmail.com>
Sent: Monday, August 1, 2022 1:08 AM
To: Jennifer Guetschow
Subject: [EXT]EIR--Dana Reserve Specific Plan

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer Guetschow, To Whom It May Concern,

The proposed Dana Reserve Specific Plan should be halted primarily because its impacts are far greater than the social and economic benefits of the project. First, the dense tract development does not fit with the rural nature of our community. A lot of design elements and window dressing has been put into this project to make it sound and seem like something that would be fitting (equestrian trails, architectural designs, etc.), but as you are likely aware the underlying goal of those proposing this project is to make millions of dollars for the developers while enticing planners with an exchange of potential tax dollars and a hope for more housing. We need you to see sharply through and about this dense project that is not consistent and not compatible with the area and good planning principles. EUr-1 EUr-2

Good land planning should take into account the gestalt or the bigger picture of the people and places that make up the community. Decimating an area of oak woodland is not respectful, please protect the existing oaks as they are and the habitat that they create. You know--and our oak ordinance validates--that these oaks and the resulting oak woodland habitat took time to grow, they have intrinsic value, and a development of this size and density is not properly mitigating its impacts upon the oaks and 5 other Class I impacts to Biological Resources including the Burton Mesa caharral and possibly the Pismo Clarkia. EUr-3

Recently I had the opportunity to travel throughout many counties and cities in California and the coast of Oregon. Over and over I was impressed with the appreciation and protection of the natural elements that make up those regions. It was this love, respect and intermingling with nature that made those places worth living and worth visiting. On my way back home I traveled through areas that were not gifted with natural resources or the natural resources were removed. In those places, no one cared to be there. The word and image of barren, dry hills come to mind. And where there were developments there still was no *real* sense of place or of hope/energy of the community. Natural habitat attracts humans just as it does wildlife, it brings a certain sustainability, a value, a beauty and something that cannot be replaced--economically and especially socially (care and appreciation of other animals and natural resources...it is this care for another that is especially helpful to encourage/inspire us to sustain this democracy in divided times). Yet, if land planning is not adjudicated well, that which took so long to create is easily destroyed. A loss of great magnitude occurs to humans and animals, devastating more than our awareness manages. Developers are tempted to ignore this, but you have been entrusted to uphold principles of good land planning and to ensure that guidelines are met and ideally surpassed. I'm sure you have seen and felt the loss of areas that were poorly planned and what has become of the region. The word cruel comes to mind, devoid of hope for any remedy. Many of us in the community go to work every day--just as I imagine you do--to create something of worth, of beauty, of value, something worthy of enduring. Not for today and tomorrow but for an inspired and sustained future that we know little about. We each have benefited from those who have worked similarly before us, many of whom respected and protected nature for us to appreciate. Nature sustains us, those 3,400 oak trees and the wildlife that they provide sustain us. It is what makes areas liveable and loveable, and in the big picture it is what ***really*** makes areas economically and socially valuable and viable. EUr-4

I have many significant concerns, some which remain unmitigated, these concerns outweigh any social and economic benefit from the project in its current form. Please send the project back for revision because I deserve better, the community of Nipomo deserves better than: **traffic** accidents and Pomeroy's death turn, traffic density, **noise** in a rural natured area, **views and wildlife habitat of oak woodland** destroyed, **lot sizes** and high density are not compatible and EUr-5

1

consistent with the nature of the acreage lots in the area, **air pollution and further jeopardizing the pulmonary health of Nipomo's citizens**, seawater intrusion, **water** supply/severe **drought** and thirst, **Key Wells Index shows a declining water level, not adequately addressing CEQA requirements**, the **burden of housing goals placed on the small rural nature of the Nipomo community**, the **false and disrespectful mitigation measures to "offset" oak removal and wildlife habitat** in our area by the developer. The proposal is not equivalent and not nearly mitigated. Send this project back, do not let the developer despoil the land with this overly ambitious project that is clearly not consistent or compatible with nature and the nature of our community.

EUr-5
(cont'd)

Respectfully,
Eric Urbain

2

9.5.124.1 Response to Letter from Eric Urbain

Comment No.	Response
EUr-1	This comment expresses concerns related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
EUr-2	This comment raises concern regarding the project's consistency with the existing visual character and rural nature of the project area. Refer to PH-1, which addresses this comment.
EUr-3	This comment raises concern regarding the loss of oak trees at the project site, inconsistency with the County's Oak Woodland Ordinance, and adequacy of mitigation for biological resources. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site and ES-3, which addresses comments related to applicable planning policies.
EUr-4	This comment raises concern regarding the loss of oak trees and natural habitat as a result of proposed development. This comment also asserts that the oak trees lend toward the economic and social value of the community. Refer to BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and CE-3, which addresses comments related to social and economic impacts.
EUr-5	This comment raises concern regarding an increase in social and economic impacts, traffic congestion, noise, degradation of views of oak woodlands and natural habitats and adequacy of proposed mitigation, consistency with the rural nature of the project area, air pollution, water supply and quality during drought conditions, and density of proposed housing. Refer to CE-3, which addresses comments related to social and economic impacts; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; PH-1, which addresses comments related to the project's consistency with the rural nature of the project area; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; and BR-2, which addresses comments related the density of proposed residential uses.

9.5.125 Valerie Vaz

Jennifer Guetschow

From: Valerie Vaz <valvaz100@gmail.com>
Sent: Monday, August 1, 2022 2:21 PM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

As a resident of South County I was happy to see Dana Reserve as a proposed project. It will provide much needed housing to the south county, including affordable housing.

I moved to the Central Coast with a job transfer 7 years ago. I was fortunate to be able to buy my home when I moved. With that said, I was earning above a "head of household" income, and had a housing budget up to $500k. I was able to find a 3/2 townhouse in Arroyo Grande for $485k. Today, I could not afford to buy my own home.

As we attempt to attract new companies to the region, we need to provide housing for their workforce. I believe that the lack of inventory will continue to drive up our home prices and price out potential employees.

I fully SUPPORT Dana Reserve!

-

Valerie Vaz
cell 805-234-5285 | email valvaz100@gmail.com

VV-1

1

9.5.125.1 Response to Letter from Valerie Vaz

Comment No.	Response
VV-1	This comment states support for the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.126 Kimberley and Darrell Victor

From: Kimberley Victor <victors2000@att.net>
Sent: Monday, August 1, 2022 8:50 AM
To: Jennifer Guetschow
Subject: [EXT]Dana Reserve

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Nipomo should slow down and re-visit all projects on the books. To say that a project has been on the path for ten years was fine 25 years ago. This is a new world. Our climate is changing right before our eyes. What was done in the past no longer applies. All projects that have to do with water use has to be dealt with as we did with environmental issues (EIR) in the past moving forward. Pumping more water out of the ground is not the answer moving forward. What happens when we over pump our ground supplies and saltwater intrusion happens. A contract agreed upon as little as a couple of years ago has to be revisited with a projected study of scenarios from best to wort case before any medium to large project should move forward. We cannot endanger the residents of south county for the benefit of a small portion of us. This project has to be reduced or put on hold.

KDV-1

KDV-2

KDV-3

Thank you,
Kimberley &Darrell Victor
665 Sequoia Ln., Nipomo

9.5.126.1 Response to Letter from Kimberley and Darrell Victor

Comment No.	Response
KDV-1	This comment raises concern regarding climate change and water use. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions and MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
KDV-2	This comment raises concern of the reliability of water supply. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
KDV-3	This comment suggests postponing the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.127 Paula Browne

Der Jenifer

My name is Sue Shaleen I live at 749 Glenhaven Place, Nipomo CA. I am submitting a public comment regarding Dana Reserve Development, for Paula Brown, 765 Glenhaven Place, Nipomo CA. Paula does not have internet but would like to make a comment. PB-1

"I have lived here in Nipomo since 1970. I have seen many changes over the years. The DRD has me concerned over the many houses that will be squeezed together on this parcel. The housing is to condensed, it will create an overload of traffic, pollution, hurt our wild life, and stress our current Public Services. PB-2

My water bill continues to go up- we are told we are in a sever drought. The water company is guaranteeing water for this project. If they have the power to guarantee water for all, then end the drought. They do not have that absolute power. I'm asking the planning commission to rethink the scope of this project. PB-3

I oppose it. Thank you , Paula Browne."

9.5.127.1 Response to Letter from Paula Browne

Comment No.	Response
PB-1	This comment provides background on the commenter. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
PB-2	This comment raises concern regarding traffic, pollution, biological resources, and public services. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of transportation improvements; GRo-3, which responds to comments related to air quality and greenhouse gas emissions; BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; and MR-2 and KE-3, which responds to comments related to public services.
PB-3	This comment raises concern regarding water supply and associated costs. Refer to MR-1 and GRe-1 through Gre-4, which responds to comments related to water supply and associated costs.

9.5.128 Alfred Holzheu, President, California Fresh Market

CALIFORNIA Fresh MARKET

2886 Mission Drive, Solvang CA 93463

555 Five Cities Drive, Pismo Beach CA 93449
771 E Foothill Blvd, San Luis Obispo, CA 93405

Jennifer Guetschow
County of San Luis Obispo
Via email: jguetschow@co.slo.ca.us
Draft Environmental Impact Report Dana Reserve

Dear Jennifer Guetchow,

I am writing on behalf of California Fresh Markets to express support for the proposed development of Dana Reserve (Cañada Ranch).

California Fresh Markets are a locally owned chain who have served the Tri-Counties for over 50 years with stores in Solvang, Pismo Beach and San Luis Obispo, specializes in freshly prepared wholesome foods, along with a complete supermarket selection of conventional/organic/gourmet vegetables, grocery products, deli meats and cheeses, local wines, adult beverages from many local sources and all of the USA and the world. We roast our own coffees, prepare all our deli salads, hot foods, Sushi, freshly made juices and much more from scratch every day.

Dana Reserve in Nipomo is a perfect location for us, located in the growing Central Coast area and conveniently between our other stores. We look forward to the added housing for employee's close to our Pismo and San Luis Obispo locations and of course this location as well. And, due to our focus on customer service, and the need to make so many of our products fresh every day, we expect at least 120 employees, with over half fulltime and a management staff of highly trained department managers, ie. Service Deli, Produce, Fresh Service Meats, Grocery and Adult Beverages.

We are excited about bring our special brand of commitment to Fresh Foods to Dana Reserve and the Nipomo area and of course completely support the Dana Reserve Specific Plan.

CFM-1

Sincerely

Alfred Holzheu
President
California Fresh Markets.

9.5.128.1 Response to Letter from Alfred Holzheu, President, California Fresh Market

Comment No.	Response
CFM-1	This comment expresses support for the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.

9.5.129 John Joyce

I am sending you this letter in opposition to the 288-acre Dana Reserve Project because the overall impacts of this development outweigh any social and economic benefits of the project.

I'm a resident living adjacent to the proposed site. I have read the Dana Reserve Specific Plan, attended an online meeting last year with the developer and county, the July 14th public meeting (also disappointedly online) and read through the Draft Environmental Impact Report (DEIR) to provide my comments below. JJ-1

The prepared DEIR for the project determined 6 Un-mitigatable, significant issues including: JJ-2

1. Biological impacts (3,948 oaks trees to be removed, federally endangered species to be removed, special habitats to be destroyed)
2. Land Planning (multiple elements of the project are out of alignment with the South County Area Plan. Most egregious are the extremely small lots planned to be immediately adjacent to our neighborhood of greater than 1 acre lots.) JJ-3
3. Housing (there are not enough jobs in Nipomo to support such dense housing which will increase traffic) JJ-4
4. Transportation (increased traffic impacts on many roads around the project and throughout Nipomo) JJ-5
5. Air Quality (some of our neighbors and I have medical issues and will suffer from the high allowable dust emissions during construction since we are directly downwind) JJ-6
6. Greenhouse Gas Emissions

My wife and I own and live one lot away from the boundary line between our established rural neighborhood and this large dense project. IMHO this project will destroy the 40 year old rural nature of our neighborhood and that's the main reason we moved here in the first place.

We were not notified by our sellers or their realtor that the project application had been approved by the County Board of Commissioners when we purchased this property one lot away from the proposed development. We've not received any mailed notifications from the county about opportunities to comment on the project in the entire time we have lived here. There has not been sufficient outreach by the developer or opportunity for the community to comment by the county. Our County Commissioner, apparently in the pocket of these developers has refused to meet with us to discuss our concerns. JJ-7

There are many significant impacts from the Dana Reserve Project that will negatively impact the whole Nipomo Community, not just immediately adjacent residents like us.

Our specific concerns follow.

Biological:

• Six Class I impacts to Biological Resources are identified in the Draft EIR: The Draft EIR fails to address these adequately. There would be additional Class I impacts, such as to Pismo Clarkia, in which mitigation measures for replanting has been unsuccessful in the past. JJ-8

• Allowing Burton Mesa chaparral mitigation outside SLO County or off the Nipomo Mesa, is inadequate mitigation, considering these habitats are not adjacent to the project site. This will impact wildlife that cannot relocate. JJ-9

• The developer is not being environmentally responsible by only preserving the oaks in the middle of the project site, and then buying a remote hilltop parcel (Dana Ridge) with oak trees. The Dana Ridge is not an appropriate mitigation site for loss of oaks and Oak Woodland (Impacts BIO 15 and 18 in the DEIR). If this project is approved as is, in the future, developers will continue to clear large swaths of trees in prime habitat for oaks and other sensitive species. in favor of undesirable locations on the fringes of where oaks can survive. This will lead to a total net loss of oaks in the county. This will also undermine the existing Oak Tree Ordinance for all future developments that come up in the county and cause the overall loss of this sensitive and very important resource for everyone in our county. JJ-10

• Additional alternatives should be considered and drawn out for reviewing to reduce the impacts to onsite oaks and rare plants and habitats. Consideration should be given to much reduced housing. Maintain linkage of the native habitats left onsite. This project is overly loaded with homes to the determent of the biological resources on-site. JJ-11

• Certainly there should be consideration of larger lots adjacent to the existing rural adjacent property in those neighborhoods impacted. Ours is one of those particularly impacted. JJ-12

• The county needs to provide maps and additional rationale for the alternatives offered and develop other alternatives that reduce the overall number of new homes and show the advantages of a smaller project. JJ-13

Land Use Planning:

• The EIR states that the County's South County Area Plan includes an outline for future development of La Canada Ranch (another name for the project site) This identified the following land uses in order of priority: 1. Open space uses 2. Industrial Park(s) 3. Commercial retail uses. 4. Residential areas. JJ-14

• The prioritization of these land uses show that preservation of on-site oak woodlands and development of job-generating commercial and industrial uses were intended to be the primary focus of future development on-site for La Canada Ranch. These projects priorities are backwards and the reverse of the South County Area Plan.

• Alternatives should focus on rectifying the jobs/housing imbalance within Nipomo rather than simply making it worse. We already have traffic jams on the 101 at rush hours and this project JJ-15

will exacerbate the problem. JJ-15 (cont'd)

• Planning Commissioner Don Campbell directly attacked me online for my comments by saying neighboring houses on 1+ acreage should "get over" having high density housing immediately adjacent to our property during the July 14th on-line meeting. He said there were no cattle grazing on the current Dana Reserve, which is a lie, I have photographic proof. I have heard from several of my neighbors on our 1+ acre sized lots that the zoning for the neighboring project being changed from Rural Residential (RR) to Single Family (SFR) or Multi Family Residential (MFR) is a huge concern. Furthermore, he went on about his close relationship with the developer. I believe Campbell should apologize to me and recuse himself from any further deliberation or voting on this project based on his obvious bias. This bias was clearly demonstrated by Campbell even though we were all asked by the planning manager at the beginning of the meeting to avoid this type of behavior. JJ-16

• Additionally, there are real concerns from my neighbors that have roosters, chickens, peacocks, parrots, horses, goats, and cattle. Despite Don's comments that the surrounding area "is not AG", we are allowed these animals in certain densities on our land. New families moving into these SFR and MFR lots will likely not appreciate these animals and their accompanied sounds and smells. This sets the scene for major conflicts. That concern and proposed resolution such as an outward-inward phased zoning belongs in the EIR. JJ-17

• The space between these lots and those in the plan is only a 15ft setback. That minimally sized buffer will not be sufficient to prevent future conflicts that will likely occur between these lots with drastically different zoning. JJ-18

• Protection of views of more native oak trees onsite would lessen the overall biological and aesthetic impacts on the rural character of our area. We don't want to live with an ugly walled compound next door either. A significantly mature plant boundary is desirable. JJ-19

<u>Water:</u>

• The EIR itself states that water allocations from the NCSD should exceed buildout of the project but the specific timing of buildout is not known and the reliability of future water supply is uncertain due to the clear potential for prolonged periods of drought and cutbacks in the State Project Water. JJ-20

• In the project's EIR, they are concerned that the drought will exceed the stage V drought analysis, so much so that in order for the developer to develop each stage, water allocations will have to be deemed sufficient or development will be paused. A partially finished project will be an eyesore from the 101 highway, Willow and to the neighbors. Also an air quality disaster for those living adjacent downwind with lung issues like us.

• However, despite all the backroom work to bring water into the new development, a water recycling line for irrigation to mitigate depleted regional water resources is not planned for this project. If we build a new development in a water parched area, we should include all water saving measures at our disposal, not just leave it to chance that the developer will do the right things. Key well levels in Nipomo have continued to fall despite the import of water from Santa JJ-21

Maria. A water recycling plan for the community and region plus a recycled water line should be included in the project as was included for Trilogy and Cypress Ridge. JJ-21 (cont'd)

Public Facilities:

• The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further contribute to this crowding. This will impact the experience for all Nipomo students.
• Additionally, this development is within the Lange Elementary boundary, which doesn't have the capacity for all students expected to attend, so the EIR states its likely all these students will need to go to Nipomo Elementary. This school is on the other side of the freeway, and it's likely that this will cause additional backup on either North Frontage and Tefft or Thompson as most kids will be picked up and dropped off. The EIR consultant stated during the July 14th call that Lucia Mar Unified School District (LMUSD) had concerns about this plan, but that fees mitigated this concern under CEQA. However, additional alternatives to this development plan, which would reduce the overall amount of homes on-site would help to alleviate LMUSD's and existing parent residents' concerns. JJ-22
• The development of a park in the middle of the proposed project looks at first glance like an amenity; however, County Parks comments in the EIR state that "the proposed park site is too small and encumbered with drainage features that should not count toward acres used for park land" with regards to the CEQA analysis. JJ-23
• Additionally, the developer requested that a Quimby Fee credit for conveyance of the park land to the County be waived. However, County Parks stated that "a waiver of Quimby Fees would mean the long-term maintenance of the park would not be adequately accommodated." JJ-24
• Why would we let a developer propose a park, then not properly plan for the long-term maintenance? If Quimby fees are not paid, does the developer expect that long-term maintenance of the park will be paid out of HOA fees as discussed in the Dana Reserve Specific Plan? How will this affect the affordable housing residents living there? JJ-25

Affordable Housing:

• There are many amenities for affordable housing in the planned development that would be beneficial to this income group. However, these amenities come with a cost. As stated in the Dana Reserve Specific Plan, HOA's would be used for long term maintenance of facilities. As we know, HOA fees typically go up over time. If one adds in the requirements for long term maintenance of pocket parks, central park, and equestrian trails as well as all electric homes to mitigate GHG and air emissions, there are many hidden costs for those residents we are hoping to help with this housing. PG&E recently announced two 20% electric rate increases for power and proposes to make solar power rates much more expensive. So how can we say that with escalating operating costs that these houses will be affordable? JJ-26
• Additionally, it's stated that the starting cost for these homes will be $600k. A traditional loan JJ-27

at 20% down ($120K) comes with payments today nearing $2,300 per month. Even higher interest rates seem to be on the horizon as the fed tries to tame our runaway inflation. So monthly payments will likely rise as will the developers' building costs. In the July 14th online meeting Kristina Simpson-Spearman expressed concerns over how these costs meet the definition of "affordable". JJ-27 (cont'd)

Transportation:

• Since all the main shopping amenities for Nipomo are accessed by using Tefft St. this project's southern access will be the most heavily used. The most direct route for most is an extension of North Frontage Rd. right behind our house. Since that will stop at Juniper St. to the south it will do nothing to ease the traffic zig zagging onto Mary Ave. As the additional 4,500 plus new residents to Nipomo use these services it will become like Sunday at 2-4PM when the Nipomo Swap Meet causes huge backups on Mary Ave. and Tefft. The additional enforcement we are supposed to have on Tefft will be needed every day just to keep all traffic flowing. There are no additional improvements planned for North Frontage Rd. like a stop light at Sandydale Dr. Also, Frontage doesn't currently have a bike lane and has limited walkability due to poles and hydrants located within the sidewalk. Amenities along this road should be improved to accommodate lowered vehicle miles travelled (VMT) and increase walkability and bike ability as part of adherence to the South County Area Plan. This should be in the plan. JJ-28

• The increased traffic from this development will cause safety hazards at the Project's entry and exit to Pomeroy, which currently has no designed stoplight. Hazards will also occur at Camino Caballo's entry and exit to Pomeroy, which has limited visibility and is difficult to access due to speeding vehicles with no visible enforcement. The same issue exists at Pomeroy and Sandydale. A fatality in 2019 on the blind curve there highlights the safety concerns with additional traffic for residents trying to turn east (left) onto Sandydale from Pomeroy without a dedicated left turn lane. Improvements at these intersections should be incorporated into the plan. JJ-29

• As stated in the EIR, the majority of people in Nipomo commute north or south on Highway 101 to work. This large development is only going to exacerbate the daily backups on 101 as it is inevitable that many will need to work outside the service sector to afford the $600k starting price for these new homes. The likely low paying service jobs created by this project won't help this situation. Unfortunately for Nipomo, Cal Trans has deemed this area too rural for improvements like sound walls on this section of highway. JJ-30

The applicant and county seem to believe that Nipomo is ready for 4,500 new residents even though our infrastructure, and services are lacking. SLO county continually touts itself as an Environmental leader, but you wouldn't know it looking at this project. Please do not let a developer get away with an overly ambitious project, one that has 6 significant class 1 impacts. JJ-31

Air Quality

- The stated method of determining air quality downwind is completely insufficient, particularly for residents with prequalifying medical conditions. Please consider a standard similar to that used to measure the dust on the Mesa from ATV activity on the Oceano dunes. JJ-32

The negatives clearly outweigh the social and economic benefits. Please send this project back for further development of more alternatives or seriously consider the "No Project" option! JJ-33

Sincerely,

John Joyce

jbjoyce@yahoo.com

9.5.129.1 Response to Letter from John Joyce

Comment No.	Response
JJ-1	This letter expresses this commenter's opposition to the proposed project and expresses concern related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
JJ-2	This comment identifies the Class I impacts identified in the EIR and raises concern regarding the loss of oak trees and native habitats. Refer to DT-2, which addresses comments related to the project's Class I impacts and MR-3, BR-1, and JK-4, which addresses comments related to habitat loss, wildlife, and the loss of oak trees at the project site.
JJ-3	This comment expresses concern related to the project's inconsistency with the South County Area Plan in addition to the development's inconsistency with the existing rural nature of the community. Refer to ES-3, which addresses comments related to applicable planning policies and PH-1, which addresses comments related to the project's consistency with the rural nature of the project area.
JJ-4	This comment raises concern regarding an increase in housing, which would further divide the community's jobs-to-housing ratio and increase traffic. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JJ-5	This comment expresses concern related to an increase in traffic congestion in the community as a result of the proposed project. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JJ-6	This comment expresses concern related to dust and other air quality emissions and greenhouse gas emissions. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions. In addition, refer to DMW-3, which addresses comments related to dust.
JJ-7	This comment states this commenter's background to the project area and raises concern regarding inconsistency with the rural nature of the area. Refer to PH-1, which addresses comments related to the project's consistency with the rural nature of the project area. This comment asserts that this commenter was not made aware of the proposed development at the time their lot was purchased and asserts that sufficient opportunity to comment on the project was not available. As discussed in the *Executive Summary* of the EIR, in compliance with State CEQA Guidelines Section 15082, as amended, an Initial Study and Notice of Preparation (IS/NOP) was circulated on June 24, 2021, to various agencies, organizations, and interested persons throughout the region. The proposed project was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the IS/NOP. The close of the IS/NOP review period was July 25, 2021. Following the close of the 30-day comment period on the IS/NOP, a review of comment letters was conducted to identify any key issues that may require additional technical studies or background research. Pursuant to State CEQA Guidelines Section 15082 (c)(1), for projects of statewide, regional, or areawide significance, the Lead Agency is required to conduct at least one scoping meeting. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. The County hosted a scoping meeting on July 19, 2021, via a Zoom webinar. In accordance with State CEQA Guidelines the public review period for an EIR is 45 days. Public circulation of the EIR was consistent with this requirement. This comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration. This comment identifies the Class I impacts identified in the EIR. Refer to DT-2, which addresses comments related to the project's Class I impacts
JJ-8	This comment raises concern regarding the success of mitigation included in the EIR for Pismo Clarkia. Refer to KK-19, which addresses comments related to Pismo clarkia.
JJ-9	This comment asserts that allowing mitigation for Burton Mesa chaparral outside of San Luis Obispo County would be inadequate. Refer to MR-3 and KK-19, which addresses comments related to Burton Mesa chapparal.
JJ-10	This comment raises concern regarding the loss of oak trees at the project site, the adequacy of proposed mitigation for the loss of oak trees, and the project's inconsistency with the Oak Woodland Ordinance. Refer to MR-3 and JK-4 which responds to comments related to the loss of oak trees and associated mitigation and ES-3, which addresses comments related to applicable planning policies.

Comment No.	Response
JJ-11	This comment asserts that additional alternatives should be evaluated, including alternatives which would avoid impacts to biological resources and alternatives with a reduction in the number of homes. Refer to AG-3 and AG-4, which addresses comments related to project alternatives.
JJ-12	This comment suggests increasing the lot size along the fringe for consistency between surrounding rural residential uses. Refer to AG-3 and AG-4, which addresses comments related to project alternatives.
JJ-13	The comment raises concern regarding the alternative analysis and the lack of figures. Refer to KK-21, which addresses this comment.
JJ-14	This comment raises concern regarding the project's consistency with applicable planning documents. Refer to ES-3, which addresses comments related to applicable planning policies.
JJ-15	This comment raises concern regarding the community's jobs-to-housing balance and asserts that alternatives should be explored that would reduce impacts related to this issue. Refer to BR-2, which addresses comments related to population growth and the community's jobs-housing balance. Alternatives for the proposed project are analyzed in Chapter 5, *Alternatives Analysis* of the DRSP EIR. Refer to AG-3 and AG-4, which respond to comments related to alternatives and identify alternatives included in the EIR. As discussed in the alternatives analysis, alternatives that would reduce the number of residential units would be inconsistent with the project objectives. This issue was evaluated in the EIR; therefore, no changes to the environmental document are needed. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration. This comment also raises concern regarding an increase in traffic along the US 101 as a result of the proposed project. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JJ-16	This comment raises concern regarding a potential conflict of interest regarding the planning commission and the proposed project. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary. This comment also raises concern regarding the project's consistency with surrounding rural residential land uses. Refer to PH-1, which addresses this comment.
JJ-17	This comment raises concern regarding the impacts of single-family and multi-family development on raising livestock and suggests a rural residential land use is more appropriate. Refer to AG-3 and AG-4, which addresses comments related to project alternatives and JEI-6, which addresses this comment.
JJ-18	This comment raises concern regarding the project's consistency with surrounding rural residential uses and the adequacy of proposed setbacks. Refer to PH-1, which addresses this comment.
JJ-19	This comment raises concern regarding the visual impacts of the removal of oak trees on-site and suggests implementation of vegetative screening. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site.
JJ-20	This comment raises concern regarding the reliability of the NCSD water supply and asserts that if water supply is deemed inadequate, unfinished development would result in visual impacts and air quality impacts. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions. In addition, refer to DMW-3, which addresses comments related to dust. As evaluated in Section 1, *Aesthetics*, of the DRSP EIR, implementation of the project would alter the existing visual character of the rural project area and was classified as a Class I impact. As such, concern related to the alteration of the visual character of the project site is consistent with the evaluation included in the DRSP EIR; therefore, no changes in the environmental document are needed.
JJ-21	This comment asserts that a recycled water line should be included in the proposed project. Refer to KK-16, which addresses this comment.
JJ-22	This comment raises concern regarding the capacity of LMUSD facilities and asserts that the increase in the number of school-aged children being dropped off and picked up from school would exacerbate existing traffic issues. Refer to BR-6, which responds to comments regarding public schools. This comment also asserts that an alternative in which the number of residential homes would reduce demand on the LMUSD. Refer to AG-3 and Ag-4, which addresses comments related to project alternatives.
JJ-23	This comment raises concern regarding the proposed park. Refer to KK-10, which addresses this comment.
JJ-24	This comment raises concern regarding recreational facilities and the request to waive associated fees. Refer to KK-10, which addresses this comment.
JJ-25	This comment raises concern regarding the planning, the long-term maintenance, and fees associated with the proposed park. Refer to KK-10, which addresses this comment. In addition, refer to KK-11, which addresses comments related to affordable housing.

Comment No.	Response
JJ-26	This comment raises concern over the affordability of housing units with associated fees. Refer to KK-11, which addresses this comment.
JJ-27	This comment raises concern regarding the affordability of proposed residential units. Refer to KK-11, which addresses comments related to affordable housing.
JJ-28	This comment expresses concerns related to an increase in traffic congestion. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JJ-29	This comment expresses concern related to an increase in vehicles along local roadways and associated roadway hazards. Refer JK-6, JK-7, and DMW-1, which addresses these comments.
JJ-30	This comment expresses concern related to an increase in traffic congestion along US 101. Refer JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
JJ-31	This comment raises concern regarding the population increase associated with the proposed project and associated impact on existing services and infrastructure. Refer to BR-2 and DR-3, which addresses this comment. In addition, this comment identifies the project's Class I impacts. Refer to DT-2, which addresses this comment.
JJ-32	This comment raises concern regarding dust emissions and asserts that the method for determining air quality downwind is insufficient. Refer to Gro-3, which addresses comments related to air quality and DMW-3, which addresses comments related to dust.
JJ-33	This comment expresses concerns related to the project's impacts related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.

9.5.130 Timothy O'Brien

Jennifer Guetschow

Ms. Guetschow,

After reviewing the plan for the Dana Reserve, the main issue I see with this is the scale of the project.

As background, my partner and I chose a year ago to move to Nipomo based upon several factors:

1.) The relative quietness of the area. Even being close to 101, noise is not significantly different than our previous house in Sunnyvale. Most hours of the day/night it is much quieter.
2.) Ease of traffic. Except for Sunday afternoons, traffic, even in the summer, is a calm experience.
3.) The darkness. As an amateur stargazer, Nipomo is ideal for looking through a telescope.
4.) As for disclosure, we own a house on Briarwood Lane.

TOB-1

The plan isn't terrible. The scale is.

1.) The streets and access to 101 are not set up for 1291 additional houses, no matter how you set up the three access roads into the area. North Frontage Road to Mary Ave to Tefft Street is a convoluted setup already as demonstrated by the Sunday afternoon boxing in of residents by the traffic generated by the Nipomo Swap Meet.
2.) Access off Willow road will require traffic signals.

TOB-2

3.) Air quality from queues of cars waiting to get out of the area will diminish.

TOB-3

4.) No matter what they claim, the majority of the residents will not be working in Nipomo. The infrastructure is not here. We will essentially become a bedroom community of Santa Maria. Not exactly ideal for a split four lane highway (101). More traffic, more noise, more pollution. Certainly not in keeping with the ideal of creating more housing for SLO county residents.

TOB-4

5.) The so called spacing between the project and adjoining properties is extremely small. Using Neighborhood 3 as an example, claiming 65 feet between buildings is a bit of a misnomer. As pointed out, these ranchettes bordering the project have developed back yards where people utilize the property for outdoor enjoyment. The real number is 35 feet or so from the back of a two story house into someone's private back yard. Similar numbers are posted for Neighborhood 7. BTW, who is responsible for cleaning up the horse manure? Another fine thought bordering on your personal recreation area.

TOB-5

6.) While it is claimed that water isn't an issue, it can be. Not planning for the possibility of water rationing and further draining of the existing resources is irresponsible.

TOB-6

7.) While not everyone in Nipomo is connected to sewage services, we are going to extend it to 1291 more housing units and associated commercial space?

TOB-7

8.) The trees should be saved. Not transplanted or grown from native acorns. Saved. Unfortunately that would require a reduction in the number of units.

TOB-8

9.) I don't know what to say about the light pollution. The installation of street lights will radically change the nature of this section of Nipomo. The overcast evenings are going to now be dull glow of sodium vapor or similar lights.

TOB-9

So what would I do?

1.) Don't extend North Frontage road until you have a better solution for the Tefft-Mary intersection and the Tefft-101 interchange. With the opening of the new plaza behind Miner's

TOB-10

Hardware, this entire section of Nipomo will become one traffic nightmare. Adding traffic from the DRSP will create unhealthy air quality issues for most of the day. TOB-10 (cont'd)

2.) Remove the units bordering on the outside properties and create a green space (and move the horse trail away from other people's property). TOB-11

3.) Rework the project to go around stands of existing oak trees. Make these stands part of your open space concept. TOB-12

4.) Cut the number of units in half. That would come closer to maintaining the feel of Nipomo. TOB-13

The impacts from the Dana Reserve Project, in its present form, will not overcome the social and economic benefits of the project. TOB-14

In its present form, the un-mitigatable issues on the DEIR, the severe bending of the South County Area Plan, the short sightedness of the water issues, the increased need for infrastructure, and the almost insurmountable effects of the traffic disaster you are trying implement should warrant major reconsideration of this project in its whole. TOB-15

Timothy O'Brien

510 Briarwood Ln

Nipomo, CA 93444

myuzuu@gmail.com

9.5.130.1 Response to Letter from Timothy O'Brien

Comment No.	Response
TOB-1	This comment raises concern regarding the scale of the proposed project and describes Nipomo as a quiet place with ease of traffic and limited nighttime lighting. Refer to BR-2, which addresses comments related to population growth; PH-1, which addresses comments related to the project's consistency with the rural nature of the project area; DT-1, which addresses comments related to nighttime lighting; MMu-6, which addresses comments related to noise; and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
TOB-2	This comment reiterates disapproval of the proposed project based on the scale of development. This comment raises concern regarding an increase in vehicle congestion as a result of the proposed project in addition to existing traffic conditions. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.
TOB-3	This comment raises concern regarding degradation of air quality due to an increase in vehicle traffic. Refer to GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
TOB-4	This comment asserts that the project would facilitate housing for commuters outside of the county and in turn would create more traffic, noise, and pollution. Refer to MMu-6, which addresses comments related to noise; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; and GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
TOB-5	This comment raises concern regarding the project's consistency with surrounding rural developments. Refer to PH-1, which addresses this comment. This comment also requests clarity regarding maintenance of the project area. As discussed in Chapter 2, *Project Description*, of the EIR, the project would be maintained by individual HOAs. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
TOB-6	This comment raises concern regarding the reliability of water supply for the proposed project during drought conditions. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.
TOB-7	This comment expresses concern related to the extension of NCSD wastewater services to the proposed development. Refer to JK-2, JK-3, and PH-4 which responds to comments related to wastewater infrastructure.
TOB-8	This comment expresses concern over the loss of trees at the site and asserts that trees should be preserved on-site rather than removed and mitigated. Refer to MR-3 and JK-4, which responds to comments related to the loss of oak trees at the project site.
TOB-9	This comment raises concern regarding an increase in light pollution as a result of the proposed project. Refer to DT-1, which addresses comments related to nighttime lighting.
TOB-10	This comment asserts that North Frontage Road should not be extended until other local transportation issues are resolved and that an increase in traffic will create air quality issues in the area. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements and GRo-3, which responds to comments related to air quality and greenhouse gas emissions.
TOB-11	This comment suggests an alternative site layout, which includes removing housing along the fringe and relocating the proposed equestrian trail. Refer to AG-3 and AG-4, which responds to comments related to project alternatives.
TOB-12	This comment suggests an alternative site layout intended to avoid loss of oak trees at the project site. Refer to AG-3 and AG-4, which responds to comments related to project alternatives.
TOB-13	This comment suggests reducing the number of proposed housing units by 50 percent. Refer to AG-3 and AG-4, which responds to comments related to project alternatives.
TOB-14	This comment expresses concerns related to the project's impacts related to social and economic impacts. Refer to CE-3, which addresses comments related to social and economic impacts.
TOB-15	This comment suggests reconsidering this project based on inconsistency with applicable planning documents, water supply, NCSD infrastructure, and increase in traffic congestion. Refer to ES-3, which addresses comments related to applicable planning policies; MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions; JK-2, JK-3, and PH-4, which addresses comments related to NCSD infrastructure; and JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements.

9.5.131 Dustin and Jennifer Rhoades

Department of Planning and Building
ATTN: Dana Reserve / Jennifer Guetschow
976 Osos Street, Room 300
San Luis Obispo, CA 93408

CC: Lynn Compton, District 4 Supervisor
San Luis Obispo County Board of Supervisors

Dear Ms. Guetschow and the Planning Department:

We are writing this letter to voice our concerns regarding the proposed Dana Reserve residential and commercial development. We are current residents of Nipomo and live in a community adjacent to the proposed project. Our primary concerns include: the inadequate mitigation of the loss of natural habitats and oak trees; the drastic residential density shift between the established, adjacent neighborhoods and the proposed project which is incongruent with the current area's plan; and the negative impact on our local infrastructure, including in-town and CA 101 traffic and school capacity. The impacts from the proposed Dana Reserve Project will not overcome the social and economic benefits of the project and will negatively impact our community. DJR-1

According to the draft EIR, the proposed project will result in the loss of 35 acres of Burton Mesa chaparral, 75 acres of oak woodland, and 21.7 acres of oak forest. The proposal to mitigate this by replanting off site is inadequate, given the mitigation areas are dissimilar to the project site, and it does not account for the loss of mature species. The proposed mitigation will not sufficiently "replace" the loss of these mature environments and ecosystems. As more and more open space is developed into dense residential and mixed-use properties, our local ecosystems are not being replenished at the same rate that they are being destroyed. Approving the Dana Reserve as proposed will continue this slippery slope of overdeveloping every inch of open space left in our rural community. Alternatives should be considered that incorporate reducing the density of residential and commercial areas, as well as designing these areas around the existing mature ecosystems. DJR-2

As proposed, the Dana Reserve Project is inconsistent with the current neighborhood landscape of the area. The neighborhoods that border the entire project contain single family homes, on parcels of at least one acre, most larger than one acre. As proposed, the Dana Reserve project will abut our neighborhood with cluster homes ranging in density from 7.5-8.5 du/ac. While we are not opposed to having neighbors, they should fit into the existing landscape of residences. This drastic shift in density, with virtually no buffer between single family, acre+ lots and cluster homes, provides significant zoning concerns. Many of the residences bordering the proposed development have farm animal pets (chickens, horses, goats, etc.) as allowed by current zoning per acre. People moving into low density neighborhoods expect (and may be enticed by) this type of animal neighbors. Residents moving into high density residential areas (such as the proposed Dana Reserve Project) are not expecting farm animal neighbors, and may not like them, which can cause a conflict between the new and existing neighbors. This can be reduced by including single family residences on larger lots along the perimeter of the project area, increasing setback space, and planting sufficient landscaping to provide a visual barrier to mitigate this zoning discrepancy. DJR-3

Those of us who purchased properties in this rural area of Nipomo did so because we don't have a desire to live in a building dense community, nor a mixed-use neighborhood. We purposely purchased DJR-4

homes in an area that would give us proximity to open space, natural habitats, and avoid the visual and auditory pollution that comes with dense development. The proposed Dana Reserve project, with its high-density housing and commercial development, will result in a significant zoning discrepancy between the established neighborhoods and proposed new neighborhoods along the border of the Dana Reserve Project. Alternatives should be considered that provide a greater transition from the established, low-density neighborhoods to the new development. This transition should allow for a larger setback area, appropriate barrier landscaping, as well as significantly reducing the density of bordering properties from up to 8.5 du/ac to at most 2 du/ac, which is still more than twice the density of current neighborhoods.

DJR-4 (cont'd)

The density of houses being proposed, as well as the commercial plans included in the Dana Reserve Project, will have a significant, negative effect on our community's already stressed infrastructure. Given the average 3.5 people per home in Nipomo, will add approximately 4543 new residents to the existing Nipomo population of 18,182, increasing our local population by 25% in a very short period. In comparison, Nipomo's population increased 9.4% over the past 10-year period (2011-2020) 16,622 (2011) – 18,182 (2020). LMUSD has already stated they don't have the capacity to accommodate these extra students. For example, Dorthea Lange Elementary School does not have the capacity for this drastic increase in population, so likely elementary aged students will need to attend the other schools in Nipomo, leading to even more traffic congestion getting from one area of town to another.

DJR-5

In addition to in-town traffic, the addition of 4543 residents AND non-residents coming to the area for the proposed commercial amenities, like a community college and stores, will make the traffic problem on Hwy 101 S even worse. As is, traffic is at a standstill every afternoon on the 101. Given that Nipomo already has an imbalance of housing to jobs, it's very likely that the new residents won't be working in town, and will be adding over 2000 cars to the existing 101 traffic problem.

DJR-6

There is also the concern of public resources, such as water, law enforcement, and fire. Just because the NCSD has already "purchased" the water that would accommodate this project, the fact remains that our area's population is growing beyond what our natural resources can accommodate. We need to think about the future of our water supply, and how much growth our little town can actually accommodate. Yes, these houses may "fit" on the proposed property area, but the plan does not fit our community. We urge the Planning Commission to consider reducing the density of homes and commercial building to help conserve the natural habitat, and the community we live in and love.

DJR-7

Sincerely,

Dustin and Jennifer Rhoads
Residents, 532 Briarwood Ln, Nipomo

9.5.131.1 Response to Letter from Dustin and Jennifer Rhoades

Comment No.	Response
DJR-1	This comment raises concerns related to biological resources, consistency with surrounding rural development, inconsistency with applicable planning documents, traffic, public schools, and social and economic impacts. Refer to BR-1, which addresses comments related to habitat loss and wildlife; MR-3 and JK-4, which responds to comments related to the loss of oak trees and alteration of the visual character of the project site; PH-1, which addresses consistency with surrounding rural areas; ES-3, which addresses comments related to applicable planning policies; JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of improvements; BR-6, which responds to comments regarding public schools; and CE-3, which addresses comments related to social and economic impacts.
DJR-2	This comment raises concern regarding the loss of oak trees at the project site and the adequacy of mitigation at the off-site mitigation are. Refer to MR-3 and JK-4, which addresses this comment.
DJR-3	This comment raises concern regarding the project's consistency with surrounding rural development. Refer to PH-1, which addresses consistency with surrounding rural areas.
DJR-4	This comment raises concern regarding an increase in population growth associated with the project and inconsistency with surrounding rural development. Refer to BR-2, which addresses comments related to population growth and PH-1, which addresses consistency with surrounding rural areas.
DJR-5	This comment raises concern regarding an increase in population growth associated with the project and the associated impact on public schools. Refer to BR-2, which addresses comments related to population growth and BR-6, which responds to comments regarding public schools.
DJR-6	This comment raises concern regarding an increase in traffic congestion. Refer to JK-6, JK-7, and DMW-1, which responds to comments related to traffic congestion and implementation of transportation improvements.
DJR-7	This comment raises concern regarding the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.132 Maria Diets-Stover

Concerns regarding the Dana Reserve Specific Plan:

The following is in sympathy for all the Nipomo Citizens who thought they were buying rural homes and acreage in Nipomo to have or eventually have a quiet retirement environment:
I'd like to begin by referring you to the Introduction, page one of the Dana Reserve proposal document submitted in April 2021, 1.9 Implementing Ordinances/Plans paragraph #1.8.q.f. San Luis Obispo County Design Guidelines, in the document for the Dana Reserve Specific Plan. The San Luis Obispo County Design Guidelines document created in 1998 to preserve the rural environment (1. Conservation of Resources and the Environment and 2. Distinction Between Urban and Rural Areas) is no longer applicable in the way it was intended. "Since the DRSP will provide its own design direction to inform the design and planning of future development, the County's Design Guidelines document will not be applied in the review of development projects within the DRSP area." While the Dana Reserve Specific Plan includes several commendable efforts to maintain the rural environment, when all is said and done it will look like other carefully designed housing and commercial projects in the City of San Luis Obispo, a mini urban community next to rural properties. This dense housing, 1,289 dwellings on approximately 184 acres and commercial building projects on approximately 22 acres, will not blend in with the surrounding community. MDS-1

Yes, there is a housing shortage, especially an affordable housing shortage in San Luis Obispo County, but why can't that goal be accomplished without significantly changing the character of the rural environment the residents of Nipomo still enjoy today? MDS-2

The Dana Reserve Project has excellent solutions to mitigate increased traffic: Offering residents high speed internet to encourage work from home, an onsite market and restaurants, a daycare center, two transit stops and a park and ride lot and bike lanes. The problem is that most people in rural America and small cities depend on (are attached to) their cars, even for short distances. How many people currently use the SLO County bus service? Will those services bring people in Nipomo to where they work? (Should we consider an in town bus service, maybe a trolley, in Nipomo?) MDS-3

How many people in the City of San Luis Obispo routinely ride bikes to work or school? We can create more bike lanes in Nipomo or any part of the County for that matter, but if they aren't protected bike lanes, you will see very few children using them. Is the County of San Luis Obispo also willing to invest in necessary additional infrastructure to help make using alternative transportation a success? MDS-4

The EIR presentation addressed some of the water concerns (future supply and cost to those already paying for water related services in Nipomo, but did not go into enough detail. (I went on the Santa Maria Water website and could not find adequate updated information related to this.) One thing that was not addressed is how reliable is purchasing water from Santa Maria. Do we have current statistics for drought years and water needed? As the cost of purchasing water over time will increase how will residents in subsidized/affordable housing be able to afford the service? MDS-5

Thank you for your consideration.

Maria Diets-Stover
556 Riviera Circle
Nipomo, CA 93444

9.5.132.1 Response to Letter from Maria Diets-Stover

Comment No.	Response
MDS-1	This comment expresses concern related to inconsistency with applicable planning documents, change in the rural character of the project area, and density of the proposed project. Refer to ES-3, which addresses comments related to applicable planning policies; PH-1, which addresses comments related to consistency with the rural character of the project area and visual consistency.
MDS-2	This comment recognizes the housing shortage in the community but expresses concern related to inconsistency with the rural character of the project area. Refer to AG-3, which discusses project alternatives, including rural residential development and PH-1, which addresses comments related to consistency with the rural character of the project area and visual consistency.
MDS-3	This comment raises concern regarding the use of transit. Refer to EG-4, which addresses comments related to transit.
MDS-4	This comment questions the use of bicycle lanes within the community. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
MDS-5	This comment raises concern about the availability of water supply for the proposed project. Refer to MR-1 and GRe-1 through GRe-4, which responds to comments related to water supply availability during normal, single-dry, and multiple-dry year conditions.

9.5.133 Dan Woodson

Dana Reserve Draft Environmental Impact Report

Section 4-17, Transportation

Regarding TR/mm-3.1:

Even though I chair the Nipomo Traffic and Circulation Committee I am not sending this as a Nipomo T&CC member

DW-1

EIR Statement

TR Impact 3 (Class I) Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds. Mitigation Measures TR/mm-3.1 A transportation demand management program or identification of transportation demand management strategies to implement would be required of each applicant. The residential, commercial, education, and/or hotel development applicant in consultation with the County of San Luis Obispo will choose feasible transportation demand management strategies and tailor to the development proposal. Potential measures to reduce vehicle miles traveled include, but are not limited to:

My Response to mitigating proposals

1. Improve or increase access to transit - **Not possible**
   RTA has admitted an unwillingness to add more transit stops in Nipomo as there is insufficient population density to warrant more stops. I have applied several times through the Unmet Needs Program always receiving a denial response . Developer plans on providing transit stops in the project and a Park-and-Ride. These will be to no avail and does not mitigate the VMT

DW-2

2. Increase access to common goods and services – **Does not appear to be feasible**
   Common goods and services consist of numerous and various retail establishments, professional services, schools and including various medical specialties, vehicle service facilities, post offices and many other services. The developer's proposed commercial area appears to be rather limited. Will the developer be required to provide all of the common goods and services? Where will they be sited?

DW-3

3. Incorporate affordable housing into the project – **This does not mitigate VMT it increases it**
   This implies smaller lot sizes hence, more houses per acre resulting in more vehicles adding to the VMT

DW-4

4. Orient the project towards transit, bicycle, and pedestrian facilities – **Repetitive**
   Impossibility of transit already mentioned in 1. Pedestrian facilities implies easy access to good and services which probably not available per 2.

DW-5

5. Improve bicycle and/or pedestrian facilities and/or transit services – **Repetitive**
This is already addressed in 4. **DW-6**

6. Limit or eliminate parking supply – **This does not mitigate VMT it increases it**
A two or three car family will remain a two or three car family regardless of parking availability. They will simply drive farther to park thus increasing VMT. In many cases rental units are shared by more than one family (as are some single family units) This may result more than two or three cars per unit. **DW-7**

7. Implement or provide access to commute reduction programs- **How can this be done**
Will the developer fund car-, bike-, and ride-sharing programs for the design life of the project. **DW-8**

8. Provide car-, bike-, and ride-sharing programs – **Repetitive**
Same as 7. **DW-9**

9. Provide transit passes – **What transit?**
As per 1 and will the developer continue to provide passes for the design life of the project. **DW-10**

10. Provide on-site amenities at places of work. **How?**

Developer has no control over places of work. Will he be funding the amenities? if the workplace is required to provide these amenities then this is not a project provided mitigation. **DW-11**

9.5.133.1 Response to Letter from Dan Woodson

Comment No.	Response
DW-1	This comment describes this commenter's background. The comment does not identify any deficiency in the EIR and no changes in the environmental document are necessary.
DW-2	This comment asserts that improving or increasing transit is not possible due to the unwillingness of the Regional Transit Authority and asserts this will not mitigate VMT. As evaluated in Section 4.17, *Transportation*, of the EIR, Mitigation Measure TR/mm-3.1 includes the following measures that are compliant with transportation demand management (TDM) strategies identified to reduce VMT: • Improve or increase access to transit; • Increase access to common goods and services; • Incorporate affordable housing into the project; • Orient the project towards transit, bicycle, and pedestrian facilities; • Improve bicycle and/or pedestrian facilities and/or transit services; • Limit or eliminate parking supply; • Implement or provide access to commute reduction programs; • Provide car-, bike-, and ride-sharing programs; • Provide transit passes; and • Provide on-site amenities at places of work. However, the effectiveness of transit system improvement management strategies and tailored TDM strategies in reducing VMT to the extent needed to be at 15% below regional averages is not certain. Furthermore, phased buildout would result in an overall increase in regional VMT. Therefore, VMT is classified as a Class I impact in the EIR, which is consistent with the intent of this comment. As such, no changes in the environmental document are necessary. However, the comment will be made part of the administrative record and provided to local decision makers for their consideration.
DW-3	This comment asserts that the proposed commercial area would not provide adequate goods and services to reduce VMT. Refer to DW-2, which addresses this comment.
DW-4	This comment asserts that incorporating affordable housing would not reduce VMT. Refer to DW-2, which addresses this comment.
DW-5	This comment asserts that providing transit, bicycle, and pedestrian facilities would not adequately reduce VMT. Refer to DW-2, which addresses this comment.
DW-6	This comment asserts that improving bicycle, pedestrian, and transit facilities would not adequately reduce VMT. Refer to DW-2, which addresses this comment.
DW-7	This comment asserts that reducing parking supply would increase VMT rather than mitigating it. Refer to DW-2, which addresses this comment.
DW-8	This comment asserts that implementing commuter reduction programs would not adequately reduce VMT. Refer to DW-2, which addresses this comment.
DW-9	This comment asserts that provided ride-sharing programs would not adequately reduce VMT. Refer to DW-2, which addresses this comment.
DW-10	This comment asserts that providing transit passes would not mitigate VMT. Refer to DW-2, which addresses this comment.
DW-11	This comment asserts that providing on-site amenities at places of work would not adequately reduce VMT. Refer to DW-2, which addresses this comment.

9.5.134 Eric Lykens

Eric Lykens

To: Airlin Singewald
Subject: RE: [EXT]RE: 886 Hetrick follow up questions

From: Eric Lykens <elykens@charter.net>
Sent: Sunday, August 6, 2023 10:13 PM
To: Airlin Singewald <asingewald@co.slo.ca.us>; Trevor Keith <tkeith@co.slo.ca.us>
Subject: FW: RE: [EXT]RE: 886 Hetrick follow up questions

Airlin,

Here is the second email I asked Jennifer to include in the DEIR with David's responses. Not all my questions were answered and so I thought I would have those reponses in section 9.5, but I am not even listed. EL-1

Thank you,
Eric Lykens,
886 Hetrick Ave, Nipomo

From: elykens@charter.net
To: "Jennifer Guetschow"
Cc:
Sent: Wednesday August 3 2022 3:31:30PM
Subject: RE: [EXT]RE: 886 Hetrick follow up questions

Jennifer,

This email response below is missing from the thread do you have it? Bullet eight was for you and Planning it was about the road naming. EL-2

Thanks again,
Eric Lykens

From: "David Grim"
To: "Eric Lykens"
Cc: "Jennifer Guetschow", "Airlin Singewald", "JR Beard", "Daniel Solish", "John Waddell"
Sent: Friday June 24 2022 1:28:58PM
Subject: RE: 886 Hetrick follow up questions

Eric,

I have attempted to answer all of your questions here in writing—see my responses in red. Some of these questions are legal in nature, so if you want more detail than I've provided below on matters such as easements, taxation, deeds, etc., you will need to consult an attorney. Thank you, and let me know if I can be of further help.

- Nick and I share 60 foot easement that can't be built on. Does the county propose Nick Tompkins deed his 30 feet of easement to make it my future fronting easement? EL-3

1

No, the County does not propose this. If such as action were to be proposed, it would be initiated by the property owner. **EL-3 (cont'd)**

- Would the proposed public road end at the edge of the Dana Reserve not making it onto my current fronting easement?
  The access drive from the portion of Hetrick Road (private easement) going to Collector B will be a private road easement on the Dana Reserve property for the benefit of the parcels on Hetrick (including you). It will not be a public road. It would be constructed for the benefit of the three (3) property owners (including you) on Hetrick that currently have vehicular access from Pomeroy. **EL-4**
- Am I to assume the additional tax burden of the 6000sqft 30x200ft? and will the county reassess my taxes because the county will requires me to take on this burden to provide me public road access?
  No. You are taxed according to the Assessor's map. According to that information, your parcel (091-329-033) is 1.1 acres. **EL-5**
- If Nick deeds this property(6000sqft), will this change my neighbors rights of passage across my new fronting easement to the new public road location for my home? Simply will it need to be shared? 886 Hetrick is only fronting easement.
  This portion of Hetrick was originally offered to the public on an old subdivision map (~1880s), but never accepted by the County into the maintained roadway system. It is our understanding that fronting property owners of the offered road retain any pre-existing private access rights and those rights would not change due to the new development. **EL-6**
- We also talked about a gate at the end of this new public road location. If Nick cant deed this property to me, because the county will not allow it. Would the gate need to be placed 30 feet inside this easement onto my property?
  If a gate is desired to limit access to only property owners, the gate should be constructed at the Dana Reserve property line. I believe that is what is indicated in the conceptual exhibits in the Public Draft EIR. **EL-7**
- The new public road will be 20 feet wide correct? Will this allow UPS and FedEx types of trucks to drop off packages and turn around at the gate?
  Construction of new private roads must at a minimum meet Cal Fire standards. Pavement width for residential access roads is typically 20 feet with no parking, plus unpaved shoulders. If a gate is planned, there will also need to be a Cal Fire-approved turnaround, which is either a cul de sac or "hammerhead" design. Design-level considerations would be considered during the public improvement plan review process, which comes later, once and if the project is approved. **EL-8**
- The current connector B road drawing shows a median that will continue North pass this new proposed road to 886 Hetrick. Will this require me to make a U turn to comeback to this road? Or will there be a Northbound turn lane for it?
  Although the applicant has prepared conceptual exhibits, details such as this are worked out during the public improvement plan review and approval process, which comes later, once and if the project is approved. This is the design-level engineering phase for construction. In designing Collector B, we would look for the plans to accommodate left turn movements from the access drive. Typical preliminary cross sections for Collector B do not include raised medians. **EL-9**
- Will my address and road name change? And will a street sign be placed at the new road entrance?
  A street sign will be required at the intersection of the access drive and Collector B. I don't think your address will change, since Hetrick will still exist. It will just be accessed from another street—however, this question will need to be definitively addressed by the Planning Department (copied on this email). **EL-10**
- What does the county propose at the Hetrick entrance currently if it were to be closed? Fencing, Bollards, Emergency Gate?
  The closure would include removal of the intersection of Hetrick and Pomeroy Road including, but not limited to, installation of a barricade, removal of pavement from Hetrick from behind the barricade, remove stop sign and stop bar from Hetrick Ave. at Pomeroy Rd. and re-stripe Pomeroy Road. **EL-11**
- Will Dana Reserve be required to make changes aesthetically to current entrance at Pomeroy and Hetrick?
  See above response. **EL-12**

2

David E. Grim
Development Services Manager
Public Works, County of San Luis Obispo
Tel: (805) 781-5252 | An APWA Accredited Agency
Website |Twitter |Map

From: "David Grim"
To: "elykens@charter.net", "Jennifer Guetschow"
Cc: "JR Beard"
Sent: Friday June 17 2022 12:52:41PM
Subject: Re: [EXT]RE: 886 Hetrick follow up questions

Eric,

I will respond to you in writing in more detail next week. I thought we discussed all of these issues, but yes I will put it in writing for your reference.

Ultimately, your legal right of access on this private road easement will remain unchanged. The main change will be accessing Pomeroy from Collector B, and not Pomeroy directly. This is at the request of the County to improve traffic safety. We had the developer change their plans to reflect this. We cannot have two intersections so close together on Pomeroy. The access rights on the length of road abuting your property will remain unchanged, as far as "ownership" is concerned.

The specific design of the new collector b road is something that is done as part of the subdivision public improvement plan phase. All of that is done after specific plan and tentative map approval. That process takes an additional length of time, potentially years. We are not at that stage yet. I will speak to what I can, but please be aware that that level of detail comes later when we review all of the construction plans. All of the design-level engineering review is done much later in the process. At this point, these are essentially conceptual exhibits showing the overall extents of the project. I understand why you'd want to know these things, but I hope you also understand that I may not have the answers in regards to a specific tree, or gate, the specific driveway approach slope, etc. However I will do my best. **EL-13**

Thanks,

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From: elykens@charter.net <elykens@charter.net>
Sent: Friday, June 17, 2022, 12:20 PM
To: David Grim <dgrim@co.slo.ca.us>; Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Subject: Re: [EXT]RE: 886 Hetrick follow up questions

David,

We did talk about the it and the option for a closed gate, but this email dated August 5th was after our original conversation and the questions were never answered by either you or Jennifer. Nick would not own the property at the end of the project, who would own the 6000sqft that would now be on myside of the retention basin fence? The draft still shows a roadway up against my fence line through my oak tree. Would the gate be on my easement or the Dana side of the easement? This of course changes the right away of the neighbors that have their main fronting on Calimex. Will the new connector B proposed drive way have a northbound turn lane? I don't think currently the road design is wide enough for it and it appears I would have to do a uturn each time to get to it. UPS, Fedex and services vehicles to **EL-14**

my property would have to do the same. When the public ask question about a project like this do they get written answers in return, by building and planning in this process or are the email question unanswered? **EL-15**

How do changes from public works get recognize in the project scope? A conversation is not recorded and is hear say in a process that will change my property forever and its value. So the questions in my email below should probably be replied to so there is a recorded formal understanding. **EL-16**

Also how will Public works determine connector B safety of this intersection on a down hill slope? I don't see a mention of a slow down lane going west or turn lane going east on Pomeroy. Anyone that doesn't think this will be the main entrance is lying to the general public. When Nick pitched it he said it would be hardly used, so if that is the case it should just be used as a one-way inbound entrance. In order for this connector to be safe it needs to be a round about that redirects Pomeroy traffic to slow it down. Current weekend speeds are not even close to what's posted and the only way you slow traffic on this blind turn is through a round about. It will keep the bike riders and horse back riders safer slowing this traffic speed down. This is a much needed add probably in a few places on Pomeroy, developer changes are the only way you fund them. Also street lighting at this intersection will be needed, but will pollute the night sky. Doing this would probably also not require my entrance to be changed. The three neighbors would be happy off of my driveway and would make this entrance a much safer for me and the neighbors across the street. Yes he would have to change his plan and move the basins a little, but it could have saved my neighbor life a few years ago from the drunk driver that went east up Pomeroy at an unsafe speed and the countless close calls I see when people come up the road in the bike lane with people in it. If Nick truly wants help the community he can make that happen. **EL-17**

Thank you,
Eric Lykens

From: "David Grim"
To: "elykens@charter.net"
Cc: "Jennifer Guetschow"
Sent: Friday June 17 2022 8:31:59AM
Subject: Re: [EXT]RE: 886 Hetrick follow up questions

Hi Eric, if you recall, I believe I called you and we discussed all your questions below. We discussed all these topics in detail. Would you like to discuss again?

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From: elykens@charter.net <elykens@charter.net>
Sent: Friday, June 17, 2022, 1:34 AM
To: 'Eric Lykens' <elykens@charter.net>
Cc: David Grim <dgrim@co.slo.ca.us>; Jennifer Guetschow <jGuetschow@co.slo.ca.us>
Subject: [EXT]RE: 886 Hetrick follow up questions

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Jennifer and David,

Last year August I sent in this email below for your review and reply. I see my other emails made it into Appendix B. but this one did not. Who will answer the questions I have posed below and in my prior emails? I also see Nick still shows in his plan that my driveway will be abandon as if he knows what the county will allow to the fronting of my property. If you would please review my email from last August below and add it to public comment section please. **EL-18**

Thank you,
Eric Lykens
886 Hetrick Ave

From: "Eric Lykens"
To: "dgrim@co.slo.ca.us", "Jennifer Guetschow"
Cc:
Sent: Thursday August 5 2021 11:12:11PM
Subject: 886 Hetrick follow up questions

David,

I had a few follow up questions about fronting easement to a public road. Currently, the only fronting easement from my property is at the top of Hetrick and Pomeroy as we have discussed. You mentioned that the county must provide access to a public road from my fronting easement.

Here are my question:

- Nick and I share 60 foot easement that can't be built on. Does the county propose Nick Tompkins deed his 30 feet of easement to make it my future fronting easement?
- Would the proposed public road end at the edge of the Dana Reserve not making it onto my current fronting easement?
- Am I to assume the additional tax burden of the 6000sqft 30x200ft? and will the county reassess my taxes because the county will requires me to take on this burden to provide me public road access?
- If Nick deeds this property(6000sqft), will this change my neighbors rights of passage across my new fronting easement to the new public road location for my home? Simply will it need to be shared? 886 Hetrick is only fronting easement.
- We also talked about a gate at the end of this new public road location. If Nick cant deed this property to me, because the county will not allow it. Would the gate need to be placed 30 feet inside this easement onto my property?
- The new public road will be 20 feet wide correct? Will this allow UPS and FedEx types of trucks to drop off packages and turn around at the gate?
- The current connector B road drawing shows a median that will continue North pass this new proposed road to 886 Hetrick. Will this require me to make a U turn to comeback to this road? Or will there be a Northbound turn lane for it?
- Will my address and road name change? And will a street sign be placed at the new road entrance?
- What does the county propose at the Hetrick entrance currently if it were to be closed? Fencing, Bollards, Emergency Gate?
- Will Dana Reserve be required to make changes aesthetically to current entrance at Pomeroy and Hetrick?

EL-19

Jennifer/David,

Because of the additional traffic noise that this will create at the corner of my property heading East and West, I have a request. My Pomeroy facing property line is at least 5 feet below the road grade. I would like have a fence at road elevation along the front of my property or at least high enough for most cars noise to be contained to the road. I know this changes elevation a few feet at the southeast edge of my property for at least 120 feet or so. At grade a 6 foot fence is pointless at the southeast edge. The grade is less drastic at the southwest corner of my property where elevation is minimal. With a project this size can a special request be made to allow a road level fence be proposed? and request the Dana Reserve project put it in? all other homes are at or above road elevation where standard fence code applies.

EL-20

Thank you both for taking the time to answer my questions and concerns. I know some of these questions will take time to discuss and answer, but if you would document them in the public record and EIR conversation, that would be great.

Eric Lykens

6

9.5.134.1 Response to Letter from Eric Lykens

Comment No.	Response
EL-1	This comment requests that the commenter's previous comments (received prior to circulation of the Draft EIR) be included in the Final EIR. The comments have been included and are responded to herein. No changes to the environmental document are needed.
EL-2	This comment is related to previously submitted comments and does not pertain to any environmental issues. No changes to the environmental document are necessary.
EL-3	Comments EL-3 through EL-12 include previously prepared information from the County Public Works Department provided in response to the commenter's questions from a previous email. Comment EL-3 asks whether the project would result in any change in easement rights along the Hetrick Road frontage. As confirmed by the responsive information, no such change would occur as a result of this project.
EL-4	This comment asks whether the proposed new access to Hetrick Road via Collector B would extend to the commenter's frontage. Per the information provided, the new access drive would extend from Collector B to Hetrick to provide access to the three property owners currently taking access off Pomeroy. This access would be private; it would not be a public road.
EL-5	This comment relates to the tax burden of the new access. Per the County's response, tax assessment would continue to be based off County Assessor's map information.
EL-6	This comment relates to previous access rights along Hetrick. Per the County's response, the project would not change any previously established access rights.
EL-7	This comment questions whether a gate would be installed along the new access from Collector B. Per the County's response, if a gate is desired by the residents that would utilize this new access should the project be approved, it would likely be placed at the Dana Reserve property line, not on the commenter's property.
EL-8	This comment relates to road width and access. Per the County's response, the road would be constructed to meet all CAL FIRE requirements, including a CAL FIRE-approved turnaround if a gate is planned. These details would be further evaluated during the County's review of the public improvement plans.
EL-9	This comment relates to the turn movements out of the new access road. Per the County's response, these details have not been confirmed at this time. These would be further evaluated during the public improvement plan review and approval process. No changes to the environmental document are needed.
EL-10	This comment asks whether the road name would change as a result of the new access from Collector B. There are no currently known plans to rename Hetrick Road, including in response to the revised access that would occur should be project be approved.
EL-11	The comment relates to the details of the closure of Hetrick Road's current intersection with Pomeroy Road. Per the County's response, the closure would include installation of a barricade, removal of pavement, removal of the existing stop sign, and restriping of Pomeroy Road.
EL-12	This comment asks whether the project includes any aesthetic requirements at the former Hetrick/Pomeroy intersection. Refer to response to comment EL-11. In addition, these design level details would be reviewed during the public improvement plan review and approval process.
EL-13	This comment responds to an email provided by the commenter related to the details of the proposed closure of the existing Hetrick/Pomeroy intersection that would be replaced by a new access off of Collector B should be project be approved. Per the County's response, the access rights on property adjacent along Hetrick Road would not be changed; the design of Collector B and the new access road would be evaluated in detail during the public improvement plan review and approval process. No changes to the environmental document are needed.
EL-14	This comment requests details regarding the new access from Collector B. Please refer to response to comment EL-13.
EL-15	This comment relates to County communication practices and does not relate to any environmental issues. No changes to the environmental document are needed.
EL-16	This comment relates to County communication practices and does not relate to any environmental issues. No changes to the environmental document are needed.

Comment No.	Response
EL-17	This comment relates to safety at the modified access to Hetrick Road. This EIR has been prepared to evaluate the proposed Specific Plan and related entitlement; it has evaluated the project at a programmatic level, given the amount of information currently available. The future development under the Specific Plan has not been designed and this level of detail and analysis would be conducted during the public improvement plan review and approval process. Street lighting would be installed per current County and other regulations. The new access was a requirement of the County to improve traffic safety. No changes to the environmental document are needed.
EL-18	This comment is related to previously submitted comments and does not pertain to any environmental issues. No changes to the environmental document are necessary.
EL-19	Please refer to responses to comments EL-3 through EL-12.
EL-20	This comment relates to the potential for a noise barrier/fence to be installed along Pomeroy to address any additional road traffic resulting from the project. Please refer to Table 4.13-10 in Section 4.13, *Noise*, of the EIR; no substantial increase in noise is projected to occur at this location. No changes to the environmental document are necessary.

CHAPTER 10. SUPPLEMENTAL ANALYSIS OF THE 2023 DANA RESERVE SPECIFIC PLAN

10.1 INTRODUCTION

In June 2021, the County of San Luis Obispo (County) issued a Draft Environmental Impact Report (Draft EIR) for the Dana Reserve Specific Plan (DRSP). The DRSP contemplated in the Draft EIR included the development of a 288-acre mixed-use community including residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a neighborhood park. and approved a development agreement, vesting tract maps, and discretionary use permits.

The Draft EIR circulated for public comment from June 16, 2022, and closed on August 1, 2022. Comment letters were received from multiple entities, including state and local agencies, non-agency organizations, and members of the public. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132(d) and 15088, the County prepared a Final EIR that responds to comments submitted during the Draft EIR review and consultation process.

In response to comments received during the Draft EIR review and consultation process, Dana Reserve, LLC and NKT Development, LLC, collectively referred to as the project applicant, have revised the version of the DRSP contemplated in the Draft EIR. The revisions are intended to respond to community feedback and reduce the project's environmental impacts. The revisions also incorporate modifications and clarifications requested of the project by County staff. The revised DRSP, referred to herein as the 2023 Dana Reserve Specific Plan, considered with the Final EIR is the County's preferred project and the project that will be presented to the County Board of Supervisors for action.

The Final EIR will be considered with the 2023 DRSP by the County Board of Supervisors along with the applicant's request for a Conditional Use Permit (CUP) for Oak Tree Removal and Grading/Impervious Surfaces, a Vesting Tentative Tract Map (VTTM) 3159, General Plan Amendment, annexation into the Nipomo Community Services District (NCSD) service area, and a Development Agreement.

10.1.1 Purpose of Document

According to State CEQA Guidelines Section 15162, preparation of a Supplemental EIR, or recirculation of a Draft EIR that has not yet been certified, is appropriate when one or more of the following conditions are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The County has determined that this *Supplemental Analysis of the Dana Reserve Specific Plan* is necessary to document changes that have occurred to the DRSP since the Draft EIR was originally circulated. The changes proposed are relatively minor in nature and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Additionally, no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Draft EIR was circulated has been identified. The County has reviewed and considered the information contained in this document and finds that the preparation of subsequent CEQA analysis that would require public circulation, or recirculation of the Draft EIR, is not necessary.

The revisions to the Draft EIR do not require recirculation because they do not provide significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. The County shall consider this document with the Final EIR as part of the discretionary review of the proposed DRSP.

The DRSP and Final EIR may be viewed at the Planning and Building Department offices at 976 Osos Street, Room 200, San Luis Obispo, California.

10.2 2023 DANA RESERVE SPECIFIC PLAN REVISIONS

10.2.1 Summary of Project as Described in the Draft EIR

On June 24, 202~~1~~2, the County issued the Draft EIR for the adoption of the DRSP. The DRSP and EIR are intended to provide the framework for an orderly development of the Dana Reserve consistent with the *County of San Luis Obispo General Plan*. The proposed 288-acre, mixed-use development Dana Reserve (Specific Plan Area) is located on the Nipomo Mesa adjacent to the northern boundary of the Nipomo Urban Reserve Line (URL), on the west side of U.S. Route 101, and approximately 7 miles south of the city of Arroyo Grande, San Luis Obispo County, California. The 2021 DRSP evaluated in the Draft EIR includes a residential component of 1,289 (831 single-family and 458 multi-family) units; a village and flex commercial component of up to 203,000 square feet of floor area, which includes a 60,000 square-foot hotel and 30,000-square-foot educational/training facility; 11 acres of recreation and park; 49 acres of open space, trails, and drainage basins; and various infrastructure improvements (i.e., roads). Site preparation, grading, and infrastructure improvements are planned to occur in three major phases (see Chapter 2, *Project Description*).

10.2.2 Proposed Revisions to the Dana Reserve Specific Plan

The applicant has revised the DRSP to respond to community input and to reduce the project's environmental impacts and has provided a revised 2023 Dana Reserve Specific Plan (refer to Appendix A). The changes, described in more detail below, would reduce impacts to oak trees by relocating certain neighborhoods and roadways and reduce anticipated population growth through the inclusion of deed-restricted affordable housing units and age-restricted units. A decreased population would result in fewer impacts to public services and recreational facilities and would generate fewer vehicle miles traveled (VMT), which would in turn lessen greenhouse gas (GHG) emissions.

10.2.2.1 *Affordable Housing*

The applicant has agreed to increase the number of deed-restricted affordable housing units from 75 to 104, which represents 8% of the total residential units proposed. The deed-restricted units would be available for low, very low, and extremely low incomes and would help the County meet its Regional Housing Needs Allocation goal for these income categories. The estimated housing size for these deed-restricted units is 2.1 persons per household, which is less than the 3.16 persons per household anticipated in the Draft EIR for non-deed-restricted units.

10.2.2.2 *Age-Restricted Housing*

The applicant has proposed to restrict the 417 residential units in Neighborhoods (NBDs) 7, 8, and 9 to ages 55 and older (described further below). These units would not have price restrictions or deed-restricted affordability components. The age restriction requirements would meet the requirements of Civil Code Section 51.3 and require each unit to have one resident aged 55 or older. The estimated housing size for these age-restricted units is 1.85 persons per household, which is less than the 3.16 persons per household anticipated in the Draft EIR for non-age-restricted units. This revision was made to address impacts related to unplanned population increases in Nipomo.

10.2.2.3 *Collector A*

The applicant proposes to relocate Collector A from Assessor's Parcel Number (APN) 091-301-030 to APN 091-301-029 (Figures 10-1a and 10-1b). The Draft EIR determined that the development of Collector A on APN 091-301-030, in conjunction with other on-site development, would result in significant impacts to the 78.3 acres of on-site coast live oak woodland and would result in the removal of approximately 96% of this sensitive natural community. The proposed relocation of Collector A one parcel to the west would avoid removal of 200 native oak trees (approximately 7.68 acres or 9.8% of on-site woodland area).

This revision also clarifies that there will be a traffic signal at Collector A and Willow Road and include new public transportation stops north of the roundabout on Collector A and two stops at the park and ride lot along Collector A.

10.2.2.4 *Neighborhood 3*

The applicant proposes to shift NBD 3 away from the southern property line (Figures 10-2a and 10-2b). Other revisions in the document restrict structures in NBDs 7, 8, and 9 to single-story where located adjacent to existing single-family residences. However, due to the smaller lot sizes of NBD 3, this restriction is not feasible. Instead, the applicant has shifted the entire NBD 3 cluster to the north, which adds an additional 45-foot buffer between NBD 3 and the residences to the south (from 65 feet to 110

feet). This revision was made in response to comments related to inconsistent uses between the proposed project and adjacent rural residential areas.

10.2.2.5 *Neighborhoods 7 and 8*

NBDs 7 and 8 are now proposed to be age-restricted (55 and older). This revision would reduce the overall population of the Specific Plan Area, as age-restricted communities typically have smaller households (1–2 persons) and no children. This revision would also reduce the impact to the existing imbalance of jobs and housing, as occupants are less likely to be in the workforce. This revision would reduce population-related impacts, such as impacts to schools and public services, which in turn would reduce impacts to VMT and GHG emissions, and the jobs and housing imbalance. This revision was made in response to public comments related to the substantial population growth.

10.2.2.6 *Neighborhood 9*

NBD 9 is now proposed to be age-restricted (55 and older). This revision would reduce the overall population of the Specific Plan Area, as age-restricted communities typically have smaller households (1–2 persons) and no children. This revision would also reduce the impact to the existing imbalance of jobs and housing, as occupants are less likely to be in the workforce. This revision would reduce population-related impacts, such as impacts to schools and public services, which in turn would reduce impacts to VMT and GHG emissions. This revision was made in response to public comments related to the substantial population growth.

NBD 9 has also been shifted off the ridge with the oak woodland canopy (see Figures 10-2a and 10-2b). This was accomplished by reducing the number of parcels in this neighborhood and shifting the southern segment of the neighborhood to the north slightly. The reorientation of NBD 9 would avoid the removal of 69 native oak trees adjacent to the proposed open space.

10.2.2.7 *Neighborhood 10*

NBD 10 has been partially relocated (see Figures 10-2a and 10-2b). The Draft EIR version of the DRSP included all of NBD 10 adjacent to the northern property line, west of the Flex Commercial (DR-FC) land use area. The Draft EIR determined that the development of this neighborhood would result in significant impacts to oak woodlands. Alternative 1 of the Draft EIR relocated NBD 10 from the northeastern portion of the project site to the central portion of the project site adjacent to the eastern side of the proposed public neighborhood park. As a result, the proposed public park would have been reduced to 6 acres in size. However, while the Alternative 1 relocation would have conserved an additional 4 acres of oak woodland habitat in the northeastern portion of the project site, it would have resulted in the removal of older and higher-quality trees, though in a lesser quantity. The proposed revision would split NBD 10 between the Draft EIR location and the Alternative 1 location. This configuration would avoid removal of 186 native oak trees. This revision was made in response to community concerns related to oak tree removal.

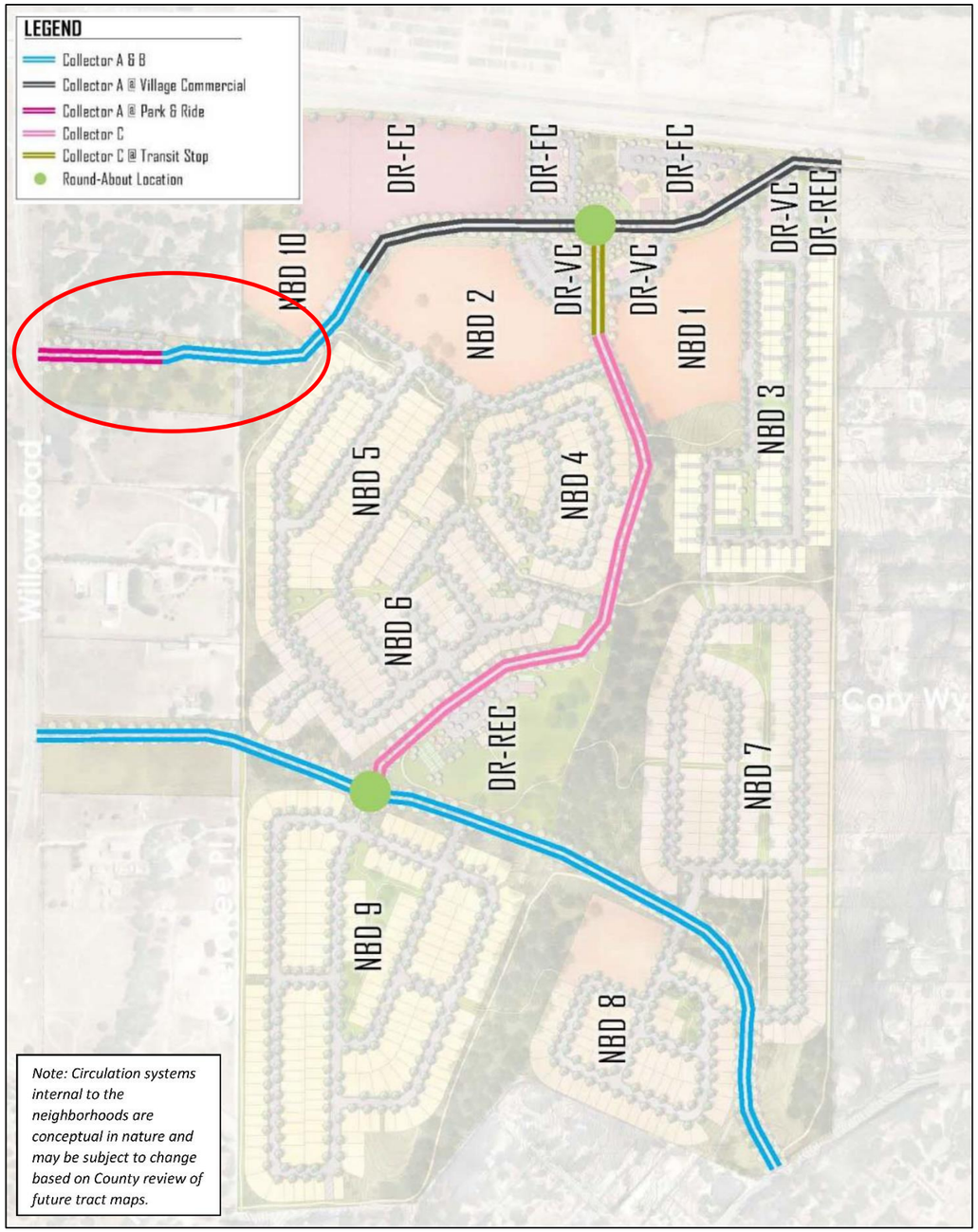


Figure 10-1a. 2021 DRSP Public Roadways.

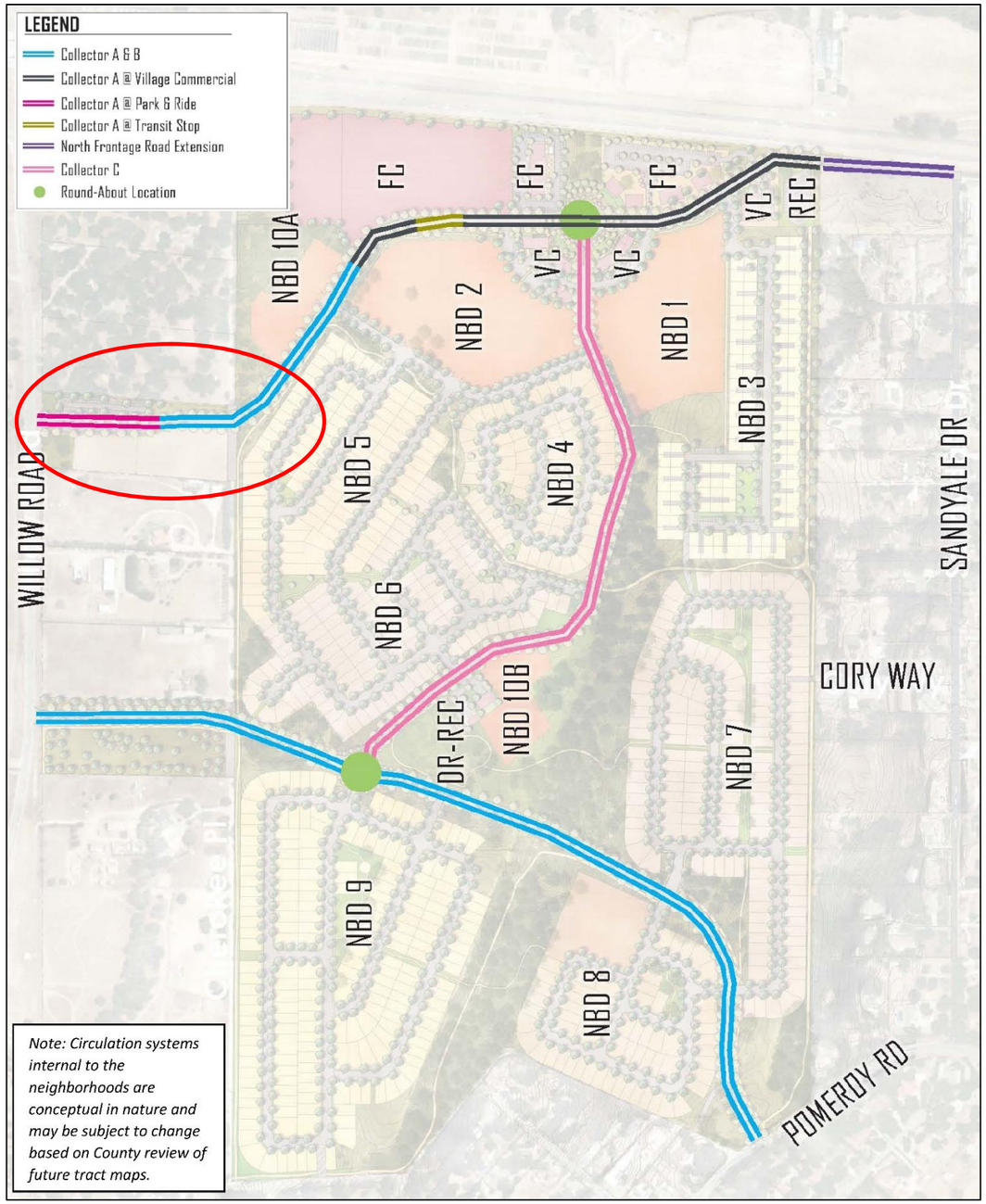


Figure 10-1b. 2023 DRSP Public Roadways.



Figure 10-2a. 2021 DRSP Concept Master Plan.

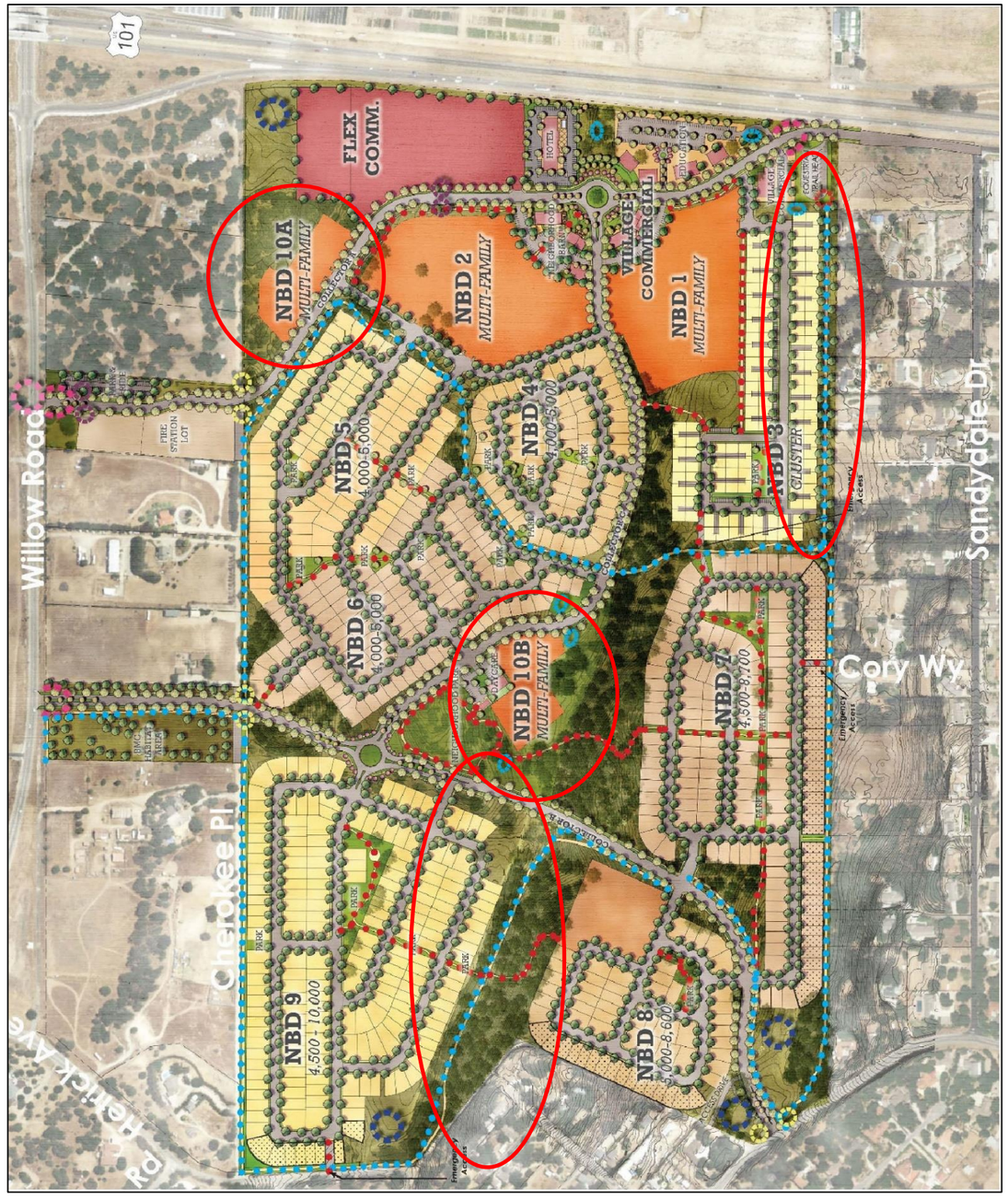


Figure 10-2b. 2023 DRSP Concept Master Plan.

10.2.2.8 *Public Park*

The 10-acre public neighborhood park adjacent to the oak woodland area has been revised to be a neighborhood park. This park would be publicly accessible but would not be a park maintained or owned by the County. The passive park would not include playgrounds, play features, shade canopies, sport courts, interpretive/educational panels, or kiosks. The size of the park has been revised from 10 acres to 7 acres and would be retained as a passive park, with minimal improvements. The revision to a passive park would maintain a greater number of on-site oak trees and better connect and transition with the adjacent open space. Whereas the active public neighborhood park would have removed 110 native oak trees, limited ~~no~~ oak trees would be removed for the passive park.

This revision was made in response to comments from the County Department of Parks and Recreation, who commented that the County was not interested in additional neighborhood parks in this area, and in response to public comments received on the Draft EIR regarding oak woodland impacts.

10.2.2.9 *Other Minor Revisions*

In addition to clean-up text, the following minor revisions to the 2021 DRSP are also included in the revised 2023 DRSP:

- **Chapter 1: Introduction**
    - Minor revision to the acreage of the Residential land uses.
    - Minor revision to the density of Residential Single-Family-2 (DR-SF2). The total number of potential units did not change.
    - Increase in total number of potential units in Residential Multi-Family from 458 to 487 (+29) and associated revision to total number of potential units from 1,289 to 1,318 (+29).
    - Minor revision to the acreage of the Open Space land uses.
- **Chapter 2: Land Use and Development Standards**
    - Residential Land Uses
        - Clarification that the Residential Rural land use includes an approximately 2-acre fire station and a potential 1-acre public safety facility (Sheriff).
        - Minor revisions to the setbacks for Residential Single-Family-1 (DR-SF1) by reducing the front setback from 16 feet to 15 feet and the rear setback from 12 feet to 10 feet.
        - Minor revision to the acreage of Pocket Park Space located in NBD 3 through NBD 9. Clarification that in addition to pocket park space, one private amenity space of approximately 3 acres may be located in NBDs 7, 8, or 9 for residential use.
        - Minor revision to the minimum required private open space from 300 feet to 200 feet.
        - Revision of maximum number of stories for Residential Multi-Family (DR-MF) from three stories to four stories. The maximum height of 45 feet did not change.
        - Addition of Minimum Lot Size for DR-MF development of at least 600 square feet. This requirement does not apply to planned unit developments (PUDs), condos, or townhomes.

- Commercial Land Uses
  - Clarification that Child Day-Care with more than 12 children requires a Minor Use Permit (MUP).
  - Revise rear setback requirement of Village Commercial (DR-VC) buildings located adjacent to residential uses from 15 feet to 10 feet.
  - Revise landscape buffer of DR-FC uses to U.S. Route 101 from 10 feet to 20 feet.
  - Addition of a minimum parking requirement in DR-VC for medical offices.
  - Revision of permit requirements for commercial uses (DRSP Table 2-8) to primarily require a Conditional Use Permit (CUP) where a Site Plan (SP) or Zoning Clearance (ZC) was previously required.

- **Chapter 3: Conservation, Open Space, and Recreation**
  - Clarify that oak tree mitigation will be per the requirements of the Final EIR.
  - Minor revisions to the preliminary grading plan, including slight adjustments of pocket parks and the trail alignment around the perimeter of the Specific Plan Area, which will avoid removal of 293 native oak trees.

- **Chapter 4: Circulation**
  - Change the bicycle lane along Collectors A, B, and C from a Class IV path to a buffered Class II path.
  - Clarify that the three existing residential properties to the west of Hetrick Avenue would include gated access.
  - Addition of a new emergency access point between NBDs 3 and 7.
  - Clarify that restrooms at the trailhead would be maintained by the Homeowner's Association (HOA) or local non-profit.
  - Minor revision to the transit hub location, which will be adjacent to the DR-VC area, north of the roundabout.

- **Chapter 5: Infrastructure and Phasing**
  - Addition of a third sewer lift station in the southeast corner of the project site.
  - Clarification that the rough grading will occur in a single phase and that final and finished grading will occur in several phases.

- **Chapter 6: Public Services**
  - Notation that the applicant has offered to donate an improved 2-acre fire station at the northwest intersection corner of Collector A and Cherokee Place.

- **Chapter 7: Implementation and Administration**
  - Clarification of the development review process and permit requirements for subsequent land uses.

- **<u>Appendix A: Objective Design Standards and Design Guidelines</u>**
  - <u>Addition of Objective Design Standards and Design Guidelines to (1) ensure future development is consistent with the vision and character of the Dana Reserve Specific Plan, (2) minimized environmental impacts, (3) provide direction for future subdividers, architects, and designers when preparing plans, and (4) provide direction for governmental review bodies for project evaluation when future applications come</u>

forward while also streamlining future reviews. Specific Design Standards added to the DRSP include:

- Updates to permitting requirements for residential, commercial, and open space/recreation land uses;
- The reduction to the maximum number of stories in the multi-family land use category from four stories to three stories;
- Acreage revisions in Table 3.1;
- Trail mileage revisions on page 3-10;
- Updates to projected student generation in Table 6.3;
- Clarifications added to discussion of interpretations, adjustments, and amendments to the Specific Plan; and
- Reference to revised Appendix A of the 2023 DRSP, which includes objective design standards and design guidelines for development within the Specific Plan Area.

10.3 IMPACT ANALYSIS

The following discussion details the effects of the revisions to the DRSP, as outlined above. Only those impacts from the Draft EIR that would be affected by the proposed revisions are discussed.

10.3.1 Biological Resources

BIO Impact 15 and BIO Impact 18: The Draft EIR determined that 75.3 acres of the 78.3 acres of coast live oak woodland on-site would be removed (96%). This equated to 3,943 oak trees, including 1,073 in the coast live oak forest habitat, 2,676 in the coast live oak woodland habitat, and 194 among Burton Mesa chaparral and grassland habitats. The revisions detailed above would avoid the removal of 858 native oak trees, including trees in the coast live oak forest habitat along the ridge and removal of the oldest oak trees on the project site; the 2023 DRSP would still require the removal of approximately 3,085 oak trees. The~~is~~ number of oak trees to be avoided by these project changes is equivalent to approximately 21.8% of the trees originally anticipated to be removed. Additionally, the two stands of native oak trees south of NBD 10B that will be avoided will be placed into a conservation easement for permanent protection. However, this reduction in tree removal may not be enough to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.2 Greenhouse Gas Emissions

GHG Impact 1 and GHG Impact 3: The Draft EIR determined that the project would generate GHG emissions in a quantity that would be significant but could be mitigated to less than significant. However, because the emissions would be primarily associated with vehicles (79%), the project would result in significant impacts related to consistency with the regional and statewide GHG-reduction efforts related to mobile source emissions, such as the 2019 Regional Transportation Plan/Sustainable Community Plan (RTP/SCS). The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer operational GHG emissions from energy use, vehicle use, waste, and water, and would result in a lesser degree of conflict with plans and policies in place for the reduction of GHG emissions. However, these reductions may not be enough to reduce GHG Impact 3 to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.3 Land Use and Planning

LUP Impact 3: The Draft EIR determined that the project would increase the gap between housing and jobs in the community of Nipomo. The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer people seeking jobs in the community, and the addition of age-restricted housing units would result in a higher population of retired persons not seeking jobs. While the jobs-to-housing ratio would not change, as the number of proposed dwelling units has not been revised, the potential adverse environmental impacts resulting from a jobs-to-housing ratio imbalance would be lessened, including vehicle commute distances and time (VMT); energy consumption, GHG emissions, and air pollutant emissions from commuters; and indirect impact on other communities that build housing, such as loss of habitat. However, these reductions may not be enough to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

LUP Impact 4: The Draft EIR determined that the project would increase regional VMT and would generate VMT per employee above thresholds, and therefore would be inconsistent with certain policies in the *County of San Luis Obispo General Plan Conservation and Open Space Element* (COSE). The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer people driving, which in turn would result in fewer vehicle commute distances and time (VMT); energy consumption, GHG emissions, and air pollutant emissions from commuters. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

LUP Impact 7: The Draft EIR determined that the project would be inconsistent with the policies in the COSE related to the preservation of views of oak woodlands. As discussed above in Section 3.1, the proposed revisions to the DRSP would result in the non-removal of approximately 21.8% of the trees originally anticipated to be removed, including trees in the coast live oak forest habitat along the visually prominent ridge. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.4 Population and Housing

PH Impact 1: The Draft EIR determined the project would induce substantial unplanned population growth in the Nipomo area and would have the potential to generate a population of 4,555, based on an average household size of 3.16 persons. This was determined to result in a total population of 22,284 in the unincorporated community of Nipomo by 2030, approximately 14.3% higher than the population projected for 2030 derived from buildout population projections. The estimated housing size for the 104 proposed deed-restricted units is 2.1 persons per household, the estimated housing size for the anticipated ADUs is 1.5 persons/household, and the estimated housing size for the proposed age-restricted units is 1.85 persons per household, which are less than the 3.16 persons per household anticipated in the Draft EIR for non-deed-restricted and non-age-restricted units. This would result in approximately 817 ~~564~~ fewer persons than originally anticipated by the Draft EIR (an approximate 18~~2~~% reduction). These revisions would result in less unplanned population growth than previously analyzed in the Draft EIR but are unlikely to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.5 Public Services

PS Impact 1 through PS Impact 5: The Draft EIR determined that the project would result in the need for additional fire protection services, but not police, school, park, or library services. Mitigation was included that requires the applicant to dedicate land for a new fire station in the community of Nipomo. PS Impact 1 was determined to be less than significant with mitigation and PS Impact 2 through PS Impact 5 were determined to be less than significant, without mitigation.

As discussed above in Section 10.3.4, the inclusion of additional deed-restricted units and the inclusion of age-restricted units in NBDs 7, 8, and 9 would result in less overall population than anticipated in the Draft EIR. Less population growth would lessen the impact on public services, including police, fire, parks, and libraries. Although senior residential areas tend to have a higher frequency of service calls, particularly for medical emergencies, the proposed project would not feature assisted living, healthcare or similar facilities, which generally generate more calls than age-restricted housing. It is expected that any rise in service calls due to the shift of NBDs 7, 8, and 9 to age-restricted housing will be balanced out by the overall decrease in population. The Draft EIR determined that a new fire station is needed in the Nipomo area, and the project has identified a site within the Specific Plan Area for the future development of a fire station. The shift of NBDs 7, 8, and 9 to age-restricted housing would not necessitate the need for a second new fire station in the Nipomo area and would not result in any increased potential for physical adverse effects on the environment due to the construction or expansion of such facilities.

Additionally, the inclusion of age-restricted units would reduce the demand on the Lucia Mar Unified School District facilities as these units would not typically be expected to house school-aged children. These impacts were determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation for PS Impact 1. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.6 Recreation

REC Impact 1: The Draft EIR determined that the project could result in an increase of use of existing recreation facilities, but that construction of proposed on-site facilities would reduce this demand. As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in less population growth than anticipated in the Draft EIR. Less population growth would lessen the impact on existing neighborhood, community, or regional parks and recreational facilities than previously anticipated in the Draft EIR. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required. The change in park uses in the 2023 Specific Plan also eliminates any project inconsistencies with County policies related to parks and recreation.

10.3.7 Transportation

TR Impact 3: The Draft EIR determined buildout of the DRSP would exceed the County residential VMT per capita threshold and overall VMT threshold and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in less population growth than anticipated in the Draft EIR. Less population growth would result in fewer vehicle miles traveled. However, these reductions may not be enough to reduce impacts to less than significant. The proposed

revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.8 Utilities and Service Systems

USS Impact 3: The Water Supply Assessment (WSA) and Draft EIR determined that the NCSD is projected to have sufficient water supply to serve the existing service area, the DRSP, and reasonably foreseeable future water supply demands during normal, single dry, and multiple dry year conditions. Despite these projections, the reliability of future water supply is uncertain ~~there may not be sufficient water supplies to serve the existing service area, the proposed project, and reasonably foreseeable future demands during normal, single dry, and multiple dry year conditions~~ due to the unknown timing of buildout of the DRSP and the uncertain reliability of future water supply due to the potential for prolonged periods of drought and increasing water demands due to population growth. As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in approximately 184% less population growth than anticipated in the Draft EIR. Reducing population growth could alleviate the pressure on water supply demand by a similar amount. This impact was determined to be less than significant with the incorporate of mitigation requiring proof of water availability; the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.4 CONCLUSION

The 2023 DRSP does not involve any conditions that require preparation of a subsequent or supplemental EIR, or recirculation of the Draft EIR. This document demonstrates that the proposed revisions do not result in any new or substantially increased significant environmental effects pursuant to State CEQA Guidelines Section 15162(a)(1) and Section 15162(a)(2). The 2023 DRSP will not result in a new significant impact or a substantial increase in the severity of an impact identified in the Final EIR pursuant to State CEQA Guidelines Section 15162(a)(3)(A) and Section 15162(a)(3)(B). Furthermore, no new information of substantial importance exists that indicates that there are mitigation measures or alternatives that are considerably different from those analyzed in the Final EIR that will substantially reduce one or more significant effects on the environment, and that the project proponents have declined to adopt the mitigation measure or alternative pursuant to State CEQA Guidelines Section 15162 (a)(3)(D).

CHAPTER 11. SUPPLEMENTAL ANALYSIS OF THE 2024 DANA RESERVE SPECIFIC PLAN

11.1 INTRODUCTION

In June 2022, the County of San Luis Obispo (County) issued a Draft Environmental Impact Report (EIR) for the Dana Reserve Specific Plan (DRSP) project. The DRSP contemplated in the Draft EIR included the development of a 288-acre mixed-use community including residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a neighborhood park. The DRSP also included a development agreement, vesting tentative tract maps, annexation into the NCSD service area, and discretionary use permits.

The Draft EIR circulated for public comment from June 16, 2022, and closed on August 1, 2022. Comment letters were received from multiple entities, including state and local agencies, non-agency organizations, and members of the public. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132(d) and 15088, the County prepared an Administrative Final EIR (2023 Final EIR) that responded to comments submitted during the Draft EIR review and consultation process. In response to comments received during the Draft EIR review and consultation process, Dana Reserve, LLC and NKT Development, LLC, collectively referred to as the project applicant, revised the version of the DRSP contemplated in the Draft EIR, referred to herein as the 2023 Dana Reserve Specific Plan. The revisions within the 2023 DRSP were intended to respond to community feedback and reduce the project's environmental impacts. The revisions also incorporated modifications and clarifications requested of the project by County staff.

The 2023 DRSP and 2023 Final EIR were presented to the County Planning Commission on September 28, October 23, and October 24, 2023, where several revisions to the DRSP were requested. As a result, the project applicant further revised the DRSP, referred to herein as the 2024 Dana Reserve Specific Plan (2024 DRSP). Thus, revisions to the proposed Final EIR were prepared and have been documented in this section.

The 2024 Final EIR will be considered with the 2024 DRSP by the County Board of Supervisors along with the applicant's request for a Conditional Use Permit (CUP) for Oak Tree Removal and Grading/Impervious Surfaces, Vesting Tentative Tract Map (VTTM) 3159, and a Development Agreement.

11.1.1 Purpose of Document

According to State CEQA Guidelines Section 15162, preparation of a Supplemental EIR, or recirculation of a Draft EIR that has not yet been certified, is appropriate when one or more of the following conditions are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The County has determined that this *Supplemental Analysis of the 2024 Dana Reserve Specific Plan* is necessary to document changes that have occurred to the DRSP since the Draft EIR was originally circulated and/or reviewed by the County Planning Commission. The changes proposed are relatively minor in nature and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Additionally, no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Draft EIR was circulated has been identified. The County has reviewed and considered the information contained in this document and finds that the preparation of subsequent CEQA analysis that would require public circulation, or recirculation of the Draft EIR, is not necessary.

The revisions to the Draft EIR do not require recirculation because they do not provide significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. The County will consider the proposed Final EIR with the proposed 2024 DRSP as part of the discretionary review of the proposed project.

The 2024 DRSP and Final EIR may be viewed at the County Planning and Building Department offices at 976 Osos Street, Room 200, San Luis Obispo, California.

11.2 2024 DANA RESERVE SPECIFIC PLAN REVISIONS

11.2.1 Summary of Project as Described in the Draft EIR

On June 24, 2021, the County issued a Notice of Preparation of a Draft EIR for the adoption of the DRSP. The DRSP and EIR are intended to provide the framework for an orderly development of the Dana Reserve consistent with the *County of San Luis Obispo General Plan*. The proposed 288-acre, mixed-use development Dana Reserve (Specific Plan Area) is located on the Nipomo Mesa adjacent to the northern boundary of the Nipomo Urban Reserve Line (URL), on the west side of U.S. Route 101, and approximately 7 miles south of the city of Arroyo Grande, San Luis Obispo County, California. The 2021 DRSP evaluated in the Draft EIR includes a residential component of 1,289 (831 single-family and 458 multi-family) units; a village and flex commercial component of up to 203,000 square feet of floor area, which includes a 60,000 square-foot hotel and 30,000-square-foot educational/training facility; 11 acres of recreation and park; 49 acres of open space, trails, and drainage basins; and various infrastructure

improvements (i.e., roads). Site preparation, grading, and infrastructure improvements are planned to occur in three major phases (see Chapter 2, *Project Description*).

11.2.2 Proposed Revisions to the Dana Reserve Specific Plan

The applicant has revised the DRSP to respond to input from the public and Planning Commission and has provided a revised 2024 Dana Reserve Specific Plan (available on the County's website at: https://agenda.slocounty.ca.gov/iip/sanluisobispo/file/getfile/160657). The changes, described in more detail below, would help achieve the County's Regional Housing Needs Allocation (RHNA) goals by increasing the amount of affordable housing proposed by the project and as directed by the Planning Commission.

11.2.2.1 *Affordable Housing*

The applicant has agreed to increase the number of deed-restricted affordable housing units from 104 to 156, which represents approximately 11% of the total residential units proposed. The deed-restricted units would be available for low, very low, and extremely low incomes and would help the County meet its RHNA goals for these income categories. These additional 52 units would be located in Neighborhoods (NBDs) 10A and 10B, as discussed below.

11.2.2.2 *Neighborhoods 10A and 10B*

As discussed in Chapter 10 *Supplemental Analysis of the 2023 Dana Reserve Specific Plan*, the location of NBD 10 would be altered and split into NBD 10A and 10B. According the Draft EIR, NBD 10 originally consisted of 75 units. As described in Chapter 10, NBDs 10A and 10B consisted of 52 units each, for an increased total of 104 deed-restricted units; the potential environmental impacts associated with the increase of units from 75 to 104 are described in Chapter 10. As discussed above, the 2024 DRSP proposes to further increase the number of deed-restricted affordable housing units from 104 to 156, which would still be built within NBDs 10A and 10B. These additional 52 units would be split between NBDs 10A and 10B.

11.2.2.3 *Accessory Dwelling Units*

In addition to increasing the number of deed-restricted affordable homes within the DRSP, the 2024 DRSP requires, at minimum, the construction of 100 accessory dwelling units (ADUs). The ADUs will be included in NBDs 4, 5, 6, 7, 8, and/or 9. The Draft EIR estimated that approximately 152 ADUs could potentially be built as a result of the project. As discussed in the Draft EIR, actual ADU construction has fallen significantly short of County predictions. Requiring the construction of 100 ADUs will ensure that additional affordable housing units will be generated by the project and will move the County closer to achieving its RHNA goals and accomplishing the underlying purpose and objectives of the project. The remaining ADUs assumed and analyzed within the Draft EIR may still be constructed at a later date and were accounted for in the Draft EIR's analysis of the potential construction of a total of 152 ADUs.

11.2.2.4 *Age-Restricted Housing*

At the request of the Planning Commissions, the 2024 DRSP no longer proposes to restrict the 417 residential units in NBDs 7, 8, and 9 to ages 55 and older, as was previously proposed in *Chapter 10: Supplemental Analysis of the 2023 Dana Reserve Specific Plan* in response to the recommendation of the County Planning Commission. As this was not a part of the original analysis in the Draft EIR, the removal of this restriction would have no effect on any of the impact determinations of the project.

11.2.2.5 *Other Minor Revisions*

In addition to clean-up text, the following minor revisions to the 2023 DRSP are also included in the revised 2024 DRSP:

- **Chapter 2: Land Use and Development Standards**
    - Updated *Table 2.1: Land Use Summary* to reflect increased unit counts at NBDs 10A and 10B areas per Planning Commission direction and expanded Open Space land use area adjacent to NBD 10B to maintain additional oak trees.
    - Updated *Section 2.3.8: Affordable Housing* text to reflect increased unit counts at NBDs 10A and 10B and identify 100 ADUs to be constructed as part of project per Planning Commission direction.
    - Updated *Section 2.4.2, Commercial Policy 4.a* to include "residential" per Planning Commission direction.
    - Updated *Table 2.7: Commercial Development Standards* to include minimum parking requirements for Residential land use category per Planning Commission direction.
    - Updated *Table 2.8: Commercial Use Table* to include "Alternative Fueling Stations" as a use for consistency with the Final EIR and added "Residential" as a use per Planning Commission direction.
    - Revised *Table 2.10: Recreation and Open Space Development Standards* to remove minimum parking requirement footnote regarding calculation method.
    - Revised *Table 2.11: Recreation and Open Space Use Table* to simplify Temporary Events use and require a Minor Use Permit.
- **Chapter 3: Conservation, Open Space, and Recreation**
    - Revised *Table 3.1: Recreation and Open Space Land Use Summary* acreages to reflect the relocation of Recreation land use category acreage to the Open Space land use category to maintain additional oak trees.
    - Revised *Section 3.2: Conservation and Open Space* text to reflect the relocation of Recreation land use category acreage to the Open Space land use category to maintain additional oak trees.
    - Revised *Section 3.3: Recreation* and *Section 3.3.1: Recreation Amenities* text to reflect updated park acreage due to expanded NBDs 10A and 10B per Planning Commission direction and expanded Open Space land use category to maintain additional oak trees.
    - Revised *Table 3.2: Required Parkland* to reflect increased unit counts at NBDs 10A and 10B per Planning Commission direction.
    - Provided additional text in *Section 3.3.1: Recreation Amenities* and *Section 3.3.2: Recreation Goals, Objectives, and Policies* related to incorporation of native plants within pocket park areas.
- **Chapter 4: Circulation**
    - Revised *Section 4.2: Street Network* text related to Collector B to add clarifying text that there will be one-way stop intersections at Pomeroy Road and Willow Road.
- **Chapter 5: Infrastructure and Phasing**
    - Revised *Section 5.2: Water* and *Table 5.1: DRSP Water Use Factor and Demand* to reflect increased unit counts at NBDs 10A and 10B and ADUs to be constructed or reasonably expected as part of project per Planning Commission direction and to ensure consistency with Water Supply Assessment (WSA).

  - Revised *Section 5.3: Wastewater* and *Table 5.2: DRSP Wastewater Generation* to reflect increased unit counts at NBDs 10A and 10B and ADUs to be constructed or reasonably expected as part of project per Planning Commission direction.

- **Chapter 6: Public Services**
  - Revised *Table 6.2: Student Generation* and *Table 6.3: Anticipated Student Generation Rate* to reflect the increased unit count at NBDs 10A and 10B and the removal of age-restriction at NBDs 7, 8, and 9 per Planning Commission direction.
  - Revised *Section 6.4: Fire and Emergency Services* to include clarifying text regarding improvements on Collector A related to the fire station site.

11.3 IMPACT ANALYSIS

The following discussion details the effects of the revisions to the 2023 DRSP, as outlined above. Only those impacts from the Draft EIR that would be affected by the proposed revisions are discussed.

11.3.1 Air Quality

AQ Impact 1: The Draft EIR found that with implementation of Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1, the project would be consistent with alternative transportation and employee VMT reduction strategies included in the SLOAPCD CAP and PM reduction requirements of SB 656. However, the project would increase regional VMT and would be potentially inconsistent with the jobs-to-housing balance included in the SLOPACD CAP. No feasible mitigation has been identified that would reduce these impacts to below applicable thresholds. Therefore, impacts related to consistency with applicable air quality plans were found to be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially change or substantially increase this impact. As a result, impacts would remain *significant and unavoidable.*

AQ Impact 2: The Draft EIR found that off-site improvements associated with the project would not conflict with an applicable air quality plan, and impacts would be less than significant. The 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant.*

AQ Impact 3: The Draft EIR found that with implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, construction-related impacts related to the generation of air pollutant emissions in exceedance of established SLOAPCD thresholds were found to be less than significant. However, even with implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational impacts related to air pollutant emissions would exceed SLOAPCD established daily emissions thresholds. Therefore, this impact was considered to be significant and unavoidable.

The Draft EIR's analysis was based on an Air Quality & GHG Analysis prepared by AMBIENT. As such, the project applicant retained AMBIENT to prepare an updated Air Quality & GHG Analysis to evaluate potential air quality related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR. Table 11-1 shows the operational air quality emissions presented in the Draft EIR.

Table 11-1. Operational Emissions without Mitigation (2021 DRSP)

	Emissions[1]						
						PM_{10}	
Operational Period/Source	**ROG**	**NOx**	**ROG+NOx**	**CO**	**Fugitive**	**Exhaust**	**Total**
Daily Emissions (lbs/day)							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
Total Project Emissions	95.4	64.6	**160.0**	**473.3**	**115.8**	**2.0**	117.8
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**550**	**25**	**1.25**	**--**
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	No	**Yes**	**Yes**	--
Annual Emissions (tons/year)							
Total Project Emissions	15.6	10.1	**25.7**	72.0	17.6	0.3	17.9
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**--**	**25**	**--**	**--**
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

[1] Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

As shown above, the Draft EIR found that the project would exceed SLOAPCD's daily operational thresholds for ROG+NOx, fugitive PM_{10}, and exhaust PM_{10}. ROG+NOx emissions would also exceed SLOAPCD's annual threshold. Table 11-2 demonstrates the operational air pollutant emissions associated with the revisions included in the 2024 DRSP.

Table 11-2. Operational Emissions without Mitigation (2024 DRSP)

	Emissions[1]						
						PM_{10}	
Operational Period/Source	**ROG**	**NOx**	**ROG+NOx**	**CO**	**Fugitive**	**Exhaust**	**Total**
Daily Emissions (lbs/day)							
Area Source	58.47	0.80	59.27	86.78	0	0.040	0.04
Energy Use	0.15	1.42	1.57	1.19	0	0.10	0.10
Mobile	65.10	51.66	116.77	418.19	96.46	0.82	97.25
Total Project Emissions	123.73	53.88	**177.61**	**506.17**	**96.46**	**0.97**	97.40
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**550**	**25**	**1.25**	**--**
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	No	**Yes**	**Yes**	--
Annual Emissions (tons/year)							
Total Project Emissions	19.36	7.61	**26.98**	67.86	12.99	0.32	13.31
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**--**	**25**	**--**	**--**
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	--	No	--	--

Source: AMBIENT 2022, revised June 8, 2023

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

[1] Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

As shown above, the 2024 DRSP would exceed SLOAPCD's daily thresholds for ROG+NOx, fugitive PM_{10}, and exhaust PM_{10}. ROG+NOx emissions would also exceed SLOAPCD's annual threshold. As such, the revisions proposed by the 2024 DRSP would not cause the project to exceed any additional SLOAPCD air quality thresholds, nor would it substantially increase any of the existing exceedances found by the Draft EIR. Furthermore, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would not conflict with the implementation of the proposed mitigation. As a result, impacts would remain *significant and unavoidable*.

AQ Impact 4: The Draft EIR found that off-site improvements associated with the project could result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD emissions thresholds. However, with the implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, impacts were found to be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant.*

AQ Impacts 5 and 6: The Draft EIR found that the project, and off-site improvements associated with the project could expose sensitive receptors to substantial pollutant concentrations. However, with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1, potential impacts related to exposure of sensitive receptor locations to substantial pollutant concentrations were found to be less than significant. As shown above in table 11.3-2, the 2024 DRSP would not result in any substantial increase in air quality pollutant emissions. Further, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant*.

AQ Impacts 7 and 8: The Draft EIR found that the project and off-site improvements associated with the project could result in other emissions, such as those leading to odors, that may adversely affect a substantial number of people. However, with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-5.1, and AQ/mm-7.1, potential impacts related to exposure of people to objectionable odors would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant*.

AQ Impact 9: The Draft EIR found that the project would result in cumulatively considerable impacts related to air quality. As discussed above, the 2024 DRSP would not result in any additional air quality impacts, nor would it substantially increase or reduce the existing impacts found by the Draft EIR. Further, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with all of the mitigation measure proposed by the Draft EIR. As a result, cumulative air quality impacts would continue to be *significant and unavoidable.*

11.3.2 Biological Resources

BIO Impacts 15 and 18: The Draft EIR determined that 75.3 acres of the 78.3 acres of coast live oak woodland on-site would be removed (96%). This equated to 3,943 oak trees, including 1,073 in the coast live oak forest habitat, 2,676 in the coast live oak woodland habitat, and 194 among Burton Mesa chaparral and grassland habitats. The revisions detailed above would avoid the removal of 808 native oak trees, including trees in the coast live oak forest habitat along the ridge and removal of the oldest oak trees on the project site. This is equivalent to approximately 21% of the trees originally anticipated to be removed. Additionally, the two stands of native oak trees south of NBD 10B that will be avoided will be placed into a conservation easement for permanent protection. However, this reduction in tree removal may not be enough to reduce impacts to less than significant. As proposed revisions would not result in

new or more significant impacts than previously analyzed, no new mitigation is required, and impacts would remain *significant and unavoidable*.

11.3.3 Greenhouse Gas Emissions

GHG Impact 1: The Draft EIR determined that the project would generate GHG emissions in a quantity that would be significant but could be mitigated to less than significant, and incorporated AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1. As shown in table 11.3-3, the proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

The Draft EIR's analysis was based on an Air Quality & GHG Analysis prepared by AMBIENT. As such, the County retained AMBIENT to prepare an updated Air Quality & GHG Analysis to evaluate potential GHG related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

As discussed in the Draft EIR, construction-related GHG emissions would total approximately 29,618.8 $MTCO_2e$. Amortized GHG emissions, when averaged over the assumed 30-year life of the project, would total approximately 987.3 $MTCO_2e$ per year. Table 11-3 displays the GHG emissions associated with the 2024 DRSP after the implementation of the identified mitigation measures.

Table 11-3. Operational GHG Emissions With Mitigation (2024 DRSP)

Operational Year/Source	2030 GHG Emissions ($MTCO_2e$/year)
Area Source[1]	34.7
Energy Use[2]	550.7
Motor Vehicles[3]	11,935.4
Waste[4]	167.3
Water[5]	119.5
Total Operational Emissions:	12,807.6
Amortized Construction Emissions:	987.3
Amortized Loss of Carbon Sequestration Emissions[6]	394.9
Total with Loss of Carbon Sequestration and Amortized Construction Emissions:	14,192.2
Service Population (SP)[7]	5,082
$MTCO_2e$/SP	2.79
GHG Efficiency Significance Threshold:	**2.9**
Exceeds Threshold?	No

Source: AMBIENT (2024)

Note: Totals may not sum due to rounding. Refer to EIR Appendix D for modeling assumptions and results.

[1] Area source includes emissions associated primarily with the use of landscape maintenance equipment.

[2] Includes adjustment for California Renewable Portfolio Standards requirements and a minimum average reduction of 70 percent in residential electricity use with installation of on-site residential solar PV systems and compliance with applicable building energy-efficiency standards (PG&E 2022). Does not include emissions associated with natural gas per mitigation measure GHG-1.

[3] Based on the default fleet mix for land uses contained in CalEEMod for San Luis Obispo County.

[4] To be conservative, based on statewide annual average waste diversion rate of 60%. The County of San Luis Obispo 2006 waste diversion rate was 63% (Calrecycle 2024).

[5] Includes use of low-flow water fixtures and water-efficient irrigation systems, per current building code requirements.

[6] Calculated in CalEEMod based on loss of a total of approximately 266.5 acres, including 21.7 acres of coast live oak forest, 75.3 acres of coast live oak woodland, 35.0 acres of Burton Mesa chaparral, 125.0 acres of California perennial grassland, 3.2 acres of annual brome grassland, and 5.1 acres of Mediterranean California naturalized perennial grassland. Offsite improvements would impact approximately 0.05 acres of scrubland and 0.81 acres of grassland.

[7] Service population based on an estimated number of 4,809 residents and 273 employees (SWCA 2024).

[8] Refrigerant emissions included.

[9] Estimated emissions reflect total project-generated emissions, with the inclusion of the proposed commercial, educational, and hotel land use components. Hotel, commercial, and educational emissions are based on previously calculated emissions (County San Luis Obispo 2024). Commercial land uses noted in this table include educational land uses. Emissions include GHG mitigation measures, as noted in the DEIR prepared for this project (County of San Luis Obispo 2024).

As shown above, mitigated operational emissions would total approximately 14,192 $MTCO_2e$ per year and the project's GHG efficiency would be approximately 2.79 $MTCO_2e$ per service population per year, which is below the corresponding efficiency threshold of 2.9 $MTCO_2e$ per service population per year for ensuring consistency with SB 32 GHG-reduction requirements. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1, operation of the 2024 DRSP would have a less-than-significant impact on the environment related to GHG emissions. Therefore, impacts would remain *less than significant with mitigation.*

GHG Impact 2: The Draft EIR found that off-site improvements associated with the project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. With the incorporation of Mitigation Measure AQ/mm-3.1, impacts would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would not conflict with the proposed mitigation. As a result, impacts would remain *less than significant with mitigation.* Refer to EIR Appendix L.

GHG Impact 3: The Draft EIR found that the project would potentially conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As discussed above, implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 would reduce potential impacts related to operational GHG emissions from the proposed project. However, the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 RTP/SCS and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain. Therefore, the Draft EIR concluded that even with implementation of identified mitigation, potential impacts would be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *significant and unavoidable.*

GHG Impact 4: The Draft EIR found that off-site improvements could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. However, based on required compliance with existing regulations, impacts would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be required to comply with the same regulations identified in the Draft EIR. As a result, impacts would remain *less than significant.*

GHG Impact 5: The Draft EIR found that the project would result in a cumulatively considerable impact to greenhouse gas emissions. Even with the incorporation of Mitigation Measure TR/mm-3.1, impacts would be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *significant and unavoidable.*

11.3.4 Population and Housing

PH Impact 1: The Draft EIR determined the project would induce substantial unplanned population growth in the Nipomo area and would have the potential to generate a population of 4,555, based on an average household size of 3.16 persons. This was determined to result in a total population of 22,284 in the unincorporated community of Nipomo by 2030, approximately 14.3% higher than the population

projected for 2030 derived from buildout population projections. However, no feasible mitigation measures were identified to reduce this impact. Therefore, this impact was considered to be significant and unavoidable. Table 11-4 shows the estimated population generation of the project presented in the Draft EIR.

Table 11-4. Project Residential Population Generation (2021 DRSP)

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size[1]	Estimated Population Generated
Single-Family	831	3.16	2,626
Multi-Family	458		1,448
Accessory Dwelling Units	152		481
Total	**1,441**	**--**	**4,555**

[1] Source: U.S. Census Bureau (2019)

As demonstrated above, based on an average household size of 3.16, the Draft EIR estimated that the project would have a total population of 4,555. Note that the 152 potential ADU units are included in this estimate. Table 11-5 shows the estimated population of the project including the revisions proposed by the 2024 DRSP.

Table 11-5. Project Residential Population Generation (2024 DRSP)

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size[1]	Estimated Population Generated
Single-Family	831	3.16	2,626
Multi-Family	539		1,703
Accessory Dwelling Units	152		480
Total	**1,522**	**--**	**4,810**

[1] Source: U.S. Census Bureau (2019)

As demonstrated above, based on an average household size of 3.16, the additional housing units proposed by the 2024 DRSP would result in a total population of 4,810. This population increase of 255 represents an increase of 6% from the estimates in the Draft EIR. While impacts from population growth would not be reduced, the revisions proposed by the 2024 DRSP would not result in a substantially increased impact, as documented with the substantial information included in EIR Appendix L. Therefore, impacts would remain *significant and unavoidable.*

Furthermore, the total population presented in the Draft EIR was conservatively estimated. Several sources show that a more accurate household size estimate for ADUs is 1.5. This is based on *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned From Portland, Seattle and Vancouver* by the San Francisco Chapter of the Urban Land Institute, which states that 57% of ADUs have one occupant and 36% of ADUs have two occupants. Additionally, *Implementing the Backyard Revolution: Perspectives of California's ADU Owners* by UC Berkeley Center for Community Innovation, states that 93% of ADUs consisted of only one to two persons (Urban Land Institute no date [n.d.]; UC Berkeley 2021). An article by the ADU Academy states that detached ADUs have a mean household size of 1.39 persons in Portland, Oregon (ADU Academy 2014). Based on an average household size of 1.5, the estimated population for the assumed 152 ADUs in the EIR would be 228, for a reduction of 253 people compared to the Draft EIR. When including this reduction in the estimates for the

2024 DRSP, the total population would be reduced to 4,557, only 2 people larger than what was estimated in the Draft EIR.

PH Impact 2: The DEIR found that off-site improvements associated with the project would not result in substantial unplanned population growth. The 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant.*

PH Impacts 3 and 4: The DEIR found that the project, and off-site improvements associated with the project would not displace existing people or housing. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. Further, the 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant.*

PH Impact 5: The Draft EIR found that the project would result in cumulatively considerable impacts related to population grown. As discussed above, the 2024 DRSP would not result in any additional impacts, nor would it substantially increase the existing impacts found by the Draft EIR. As a result, cumulative impacts related to Population & Housing would continue to be *significant and unavoidable.*

11.3.5 Transportation

TR Impacts 1 and 2: The Draft EIR found that the project, and off-site improvements associated with the project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. However, it was determined that payments to the South County Traffic Impact Fee program for Fee Area 1 and compliance with existing public improvements standards, County ordinances, and applicable regulations would ensure that the Project would be developed consistent with applicable programs, plans, ordinances, or policies, and impacts were found to be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would comply with the same regulations identified in the Draft EIR and would continue to be subject to the same fee programs. Further, the 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant.*

TR Impacts 3 through 9: The Draft EIR determined buildout of the DRSP would exceed the County residential VMT per capita threshold and overall VMT threshold and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). As such, the Draft EIR incorporated Mitigation Measure TR/mm-3.1. However, even with mitigation, the Draft EIR found that VMT impacts of the DRSP would remain significant and unavoidable with mitigation. The revisions proposed in the 2024 DRSP would not change the Draft EIR's impact determination, as discussed below.

The Draft EIR's analysis was based on a Transportation Impact Study (TIS) and a VMT Analysis prepared by CCTC. CCTC prepared an updated Transportation Impact Study TIS to evaluate potential transportation-related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

Table 11-6 displays the net new weekday daily vehicle trips, net new weekday AM peak hour trips, net new weekday PM peak hours trips, net new Sunday vehicle trips, and net new Sunday midday peak hour trips for both the 2021 DRSP and the 2024 DRSP.

Table 11-6. DRSP Trip Generation Comparison

Source	Weekday Daily	AM Peak Hour	PM Peak Hour	Sunday Daily	Sunday Midday
2021 DRSP[1]	17,892	1,156	1,379	12,930	1,201
2024 DRSP[2]	**17,621**	**1,212**	**1,416**	**12,724**	**1,233**
Change	-271	+56	+37	-206	+32

[1] Source: Transportation Impact Study, CCTC (2021)
[2] Source: Transportation Impact Study Addendum, CCTC (2024)

As demonstrated above, the 2024 DRSP produces fewer daily and weekday PM peak hour trips and slightly more weekday AM and Sunday midday PM peak hour trips compared to the 2021 DRSP. The 2024 DRSP trip generation would not change findings of the 2021 TIS. The revisions proposed by the 2024 DRSP would produce lower residential VMT per capita than what was evaluated in the 2021 TIS. Thus, the 2024 DRSP would not change the findings or recommendations in the Draft EIR. As such, TR Impacts 3 and 9 would remain *significant and unavoidable*, and TR Impacts 4 through 8 would remain *less than significant.*

11.3.6 Utility Service Systems

USS Impacts 1 through 10: The Draft EIR found that the project would have significant but mitigable impacts to Utility Service Systems. As a result, the Draft EIR incorporated USS/mm-3.1. The revisions proposed in the 2024 DRSP would not change the Draft EIR's impact determinations, as discussed below.

The analysis in the Draft EIR was based on a Water Supply Assessment (WSA) prepared by Richard G. Sweet and the RRM Design Group (RMM), and a Water and Wastewater Evaluation prepared by MKN. As such, the project applicant retained RRM to prepare an updated WSA to evaluate the potential utility service system related impacts of the buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

Water Supply

Table 11-7 compares the water demand for 2021 DRSP to the 2024 DRSP in acre-feet per year.

Table 11-7. DRSP Water Demand (af/yr)

Source	Residential	Commercial	Public	Total
2021 DRSP	269.98	44.04	36.9	350.92
2024 DRSP	**302.25**	**43.36**	**29.48**	**376.11**
Change	32.27	-0.68	-7.42	25.19

As demonstrated above, the 2024 DRSP would have an increased water demand compared to the 2021 DRSP. It should be noted that the 2024 analysis assumed that all 152 ADUs would be constructed, rather than just the 100 required by the 2024 DRSP. The Draft EIR did not account for ADU development in regard to water demand. Overall, the additional affordable housing units and required AUDs would only increase the water demand by approximately 7%. This modest increase would still leave the NCSD with a water surplus of 415 AFY, as discussed below.

The Draft EIR found that the Nipomo Community Services District (NCSD) would have sufficient supplies to meet the water demands of the project. According to the updated WSA, the NCSD's total

water supply consists of 3,0000 af/yr from the Nipomo Supplemental Water Project (NSWP), and a minimum of 1,013 af/yr from groundwater, for a total supply of 4,013 af/yr. According to the *Nipomo Community Services District Urban Water Management Plan* (UWMP), the total water demand in 2045 for the NCSD is 3,573 af, which accounts for the water demand of the original DRSP. When including the additional demand of 25 af/yr from 2024 DRSP, the NCSD would still have a surplus of 415 af/yr. Therefore, the NCSD would have sufficient water supply to serve the additional demands of the 2024 DRSP and the revisions proposed by the 2024 DRSP would not conflict with Mitigation Measure USS/mm-3.1. As such, impacts related to water supply would remain *less than significant with mitigation.*

Wastewater

Table 11-8 compares the wastewater generation for the 2021 DRSP to the 2024 DRSP in acre-feet per year.

Table 11-8. DRSP Wastewater Generation (af/yr)

Source	Residential	Commercial	Public	Total
2021 DRSP	197.97	36.27	5.5	239.80
2024 DRSP	**227.81**	**35.72**	**2.57**	**266.95**
Change	29.84	-0.55	-2.93	27.15

As demonstrated above, the 2024 DRSP would have an increased wastewater generation compared to the 2021 DRSP. It should be noted that the 2024 analysis assumed that all 152 ADUs would be constructed, rather than just the 100 required by the 2024 DRSP. Overall, the additional affordable housing units and required AUDs would increase the wastewater generation by approximately 11%. The NCSD would still have adequate capacity to account for this moderate increase.

According to the Draft EIR, the project includes off-site NCSD wastewater system improvements, including the installation of a third screw centrifugal pump, which would provide adequate capacity to treat the increase of peak hour wastewater flows. Other proposed off-site NCSD wastewater improvements would be conducted to further improve existing sewer main capacities and Southland WWTF processes. Based on the proposed off-site NCSD wastewater system improvements included in the proposed project, NCSD would have adequate capacity to treat future wastewater flows from the proposed project and projected growth within the NCSD service area; therefore, impacts were found to be less than significant. These improvements are still incorporated in the 2024 DRSP, and the NCSD would continue to have adequate capacity to treat the project's additional wastewater flows. As such, impacts would remain *less than significant.*

11.4 NON-ISSUE AREAS

The following discussion summarizes the issue areas that would not be affected by the proposed revisions to the DRSP. There is no evidence to suggest that any of the impact determinations for the following areas would change as a result of the 2024 DRSP.

11.4.1 Aesthetics

The Draft EIR found that the project would have significant but mitigable impacts related to Aesthetics and implements Mitigation Measures (MM) AES/mm-3.1, AES/mm-3.2, and AES/mm-7.1. The

additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. Further, the additional units would be consistent with the visual characteristics of the residential units previously analyzed in the Draft EIR. As such, impacts related to Aesthetics would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Aesthetics included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.2 Agriculture and Forestry Resources

The Draft EIR found that the project would have significant but mitigable impacts related to Agriculture & Forestry Resources and incorporates AQ/mm-3.2 and AQ/mm-3.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Agriculture & Forestry Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Agriculture & Forestry Resource included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.3 Cultural Resources

The Draft EIR found that the project would have significant but mitigable impacts related to Cultural Resources and implements CR/mm-1.1, CR/mm-2.1, CR/mm-2.2, CR/mm-2.3, CR/mm-2.4, and CR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Cultural Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Cultural Resources included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.4 Energy

The Draft EIR found that the project would have significant but mitigable impacts related to Energy and incorporates AQ/mm-3.1, AQ/mm-3.3, and TR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. As the additional units would be subject to the same applicable energy efficiency standards identified in the Draft EIR, adoption of the 2024 DRSP would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Further, the impacts of the 100 ADUs required by the 2024 DRSP were already accounted for, as the Energy analysis within the Draft EIR assumed that all 152 ADUs would be built. As such, impacts related to Energy would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Energy included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.5 Geology and Soils

The Draft EIR found that the project would have significant but mitigable impacts related to Geology & Soils and implements GEO/mm-1.1, GEO/mm-5.1, GEO/mm-5.2, and GEO/mm-5.3, GEO/mm-8.1, GEO/mm-8.2, and GEO/mm-8.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Geology & Soils would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or

conclusions related to Geology & Soils included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.6 Hydrology and Water Quality

The Draft EIR found that the project would have significant but mitigable impacts related to Hydrology & Water Quality, and incorporates BIO/mm-17.1 through BIO/mm-17.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. As the additional units would be subject to the same applicable building standards and regulations identified in the Draft EIR, adoption of the 2024 DRSP would not result in any issues related to water quality standards, waste discharge, or drainage. Further, the revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Hydrology & Water Quality would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Energy included in the Draft EIR, and impacts would remain *less than significant with mitigation*. Refer to *Section 11.3.6 Utility Service Systems* for a discussion of impacts related to additional water demand and wastewater generation.

11.4.7 Hazards and Hazardous Materials

The Draft EIR found that the project would have significant but mitigable impacts related to Hazards & Hazardous Materials, and implements HAZ/mm-7.1, as well as AQ/mm-7.1 and BIO/mm-16.1 through BIO/mm-16.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Hazards & Hazardous Materials would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Hazards & Hazardous Materials included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.8 Land Use and Planning

The Draft EIR found that the project would have significant and unavoidable impacts related to Land Use & Planning despite the incorporation of AES/mm-3.1, AES/mm-3.2, AES/mm-7.1, AQ/mm-3.1 through AQ/mm-3.3, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, BIO/mm-19.1. GHG/mm-1.1, PS/mm-1.1, TR/mm-2.1, and TR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Land Use & Planning would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Land Use & Planning included in the Draft EIR, and impacts would remain *significant and unavoidable*. Refer to *Section 11.3.4 Population and Housing* for a discussion of impacts related to the increased population of the project.

11.4.9 Mineral Resources

The Draft EIR found that the project would have less than significant impacts related to Mineral Resources. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Mineral Resources would be unchanged. Therefore, the

revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Mineral Resources included in the Draft EIR, and impacts would remain *less than significant*.

11.4.10 Noise

The Draft EIR found that the project would have significant but mitigable impacts related to Noise and implements N/mm-1.1 and N/mm-1.2. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. Construction and operation of the additional units would be subject to the same applicable noise standards identified in the Draft EIR. Further, the impacts of the 100 ADUs required by the 2024 DRSP were already accounted for, as the Noise analysis within the Draft EIR assumed that all 152 ADUs would be built. As such, impacts related to Noise would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Noise included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.11 Public Services

The Draft EIR found that the project would have significant but mitigable impacts related to Public Services and implements PS/mm-1.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The project would continue to be subject to the same County Public Facilities Fees identified in the Draft EIR. Adding additional housing units would proportionally increase these fees. As such, impacts related to Public Services would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Public Services included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.12 Recreation

The Draft EIR found that the project would have significant but mitigable impacts related to Recreation and incorporates AES/mm-3.1 AES/mm-3.2, AQ/mm-3.1 AQ/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-18.1 through BIO/mm-18.4, CR/mm-1.1 through CR/mm-1.4, GEO/mm-1.1, GEO/mm-5.1 through GEO/mm-5.3, GEO/mm-8.1 through GEO/mm-8.3, N/mm-1.1, N/mm-1.2, USS/mm-3.1, and WF/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. Further, the 2024 DRSP would still include the development of park space, which would reduce the demand on existing recreational facilities within the county and the community by providing new local recreational facilities, as discussed in the Draft EIR. As such, impacts related to Recreation would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Recreation included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.13 Tribal and Cultural Resources

The Draft EIR found that the project would have significant but mitigable impacts related to Tribal & Cultural Resources and implements TCR/mm-1.1 and TCR/mm-1.2, as well as CR/mm-2.1 through CR/mm-2.4. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the

project, or the boundaries of the project. As such, impacts related to Tribal & Cultural Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Tribal & Cultural Resources included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.4.14 Wildfire

The Draft EIR found that the project would have significant but mitigable impacts related to Wildfire and implements WF/mm-1.1 and WF/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Wildfire would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Wildfire included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

11.5 CONCLUSION

The 2024 DRSP does not involve any conditions that require preparation of a subsequent or supplemental EIR, or recirculation of the Draft EIR. This document demonstrates that the proposed revisions do not result in any new or substantially increased significant environmental effects pursuant to State CEQA Guidelines Section 15162(a)(1) and Section 15162(a)(2). The 2024 DRSP will not result in a new significant impact or a substantial increase in the severity of an impact identified in the Draft EIR pursuant to State CEQA Guidelines Section 15162(a)(3)(A) and Section 15162(a)(3)(B). Furthermore, no new information of substantial importance exists that indicates that there are mitigation measures or alternatives that are considerably different from those analyzed in the Draft EIR that will substantially reduce one or more significant effects on the environment, and that the project proponents have declined to adopt the mitigation measure or alternative pursuant to State CEQA Guidelines Section 15162(a)(3)(D).

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